

AGENDA
NORTHERN SUNRISE COUNTY
GOVERNANCE & PRIORITIES COMMITTEE MEETING
JUNE 12, 2026
NORTHERN SUNRISE COUNTY COUNCIL CHAMBER
9:30 AM

Page

1. **CALL THE MEETING TO ORDER**
2. **ADOPTION OF THE AGENDA**
3. **NEW BUSINESS**
 - 3 - 4 3.1 RFC: Pump Track Location Discussion
[Pumptrack Location - Pdf](#)
 - 5 - 6 3.2(a) Strategic Priorities Chart - Regional Strategic Forum
RFC: ICF Process with the Town of Peace River
[Strategic Priorities Chart Review Discussion - Regional Strategic Forum - Pdf](#)
 - 7 - 8 3.2(b) Strategic Priorities Chart - ICF Process with the Town of Peace River
RFC: ICF Process with the Town of Peace River
[Strategic Priorities Chart Review Discussion - Intermunicipal Collaboration Framework with Town of Peace River - Pdf](#)
 - 9 - 16 3.2(c) Strategic Priorities Chart - Service Level Review
RFC: Service Level Review
[Strategic Priorities Chart Review Discussion - Service Level Review - Council Direction - Pdf](#)
 - 17 - 31 3.3 RFC: Policy 1.6 Donations and Sponsorship
[RFC: Policy 1.6 Donations and Sponsorship - Pdf](#)
 - 32 - 112 3.4 Bill 28 Discussion
[Briefing Note June 12 GPC Meeting Bill 28 2026-05-19 Bill 28 Recap - Deputy Minister 2026-04-17 Bill 28 RMA Analysis ABmunis Analysis of Bill 28 - Municipal Affairs and Housing Statutes Amendment Act, 2026 2026-05-12 Briefing Note - Bill 28 and Alberta's Public Libraries](#)
4. **CLOSED MEETING**
 - 4.1 Disclosure Harmful to Intergovernmental Relations, ATIA; Section

26

that Council move to a Closed meeting as per section 197(2) of the *Municipal Government Act* at (time) for the following reason:

- Disclosure Harmful to Intergovernmental Relations, ATIA; Section 26

that Council come out of the Closed meeting at (time)

5. ADJOURNMENT



Request for Clarity
Governance & Priorities Committee - 12 Jun 2026

Topic: Pumptrack Location

Request: That Council provide direction to Administration on the desired location of the proposed pumptrack.

Background:

Council approved \$300,000 in the 2024 Capital Budget for the installation of a pumptrack at Cecil Thompson Park. Prior to the project commencing, a motion was made by Council to move the location to the hamlet of St. Isidore. The project was carried over into the 2025 capital budget and Administration had been meeting with County residents to determine the best location. A final decision was made for the desired location, pending authorization from the Catholic Church.

In budget discussions for 2026, the St. Isidore Playground group came forward requesting funding for a new playground in the hamlet. Council made the decision to fund the entire project at a cost of approximately \$200,000. Council then made the decision to remove the pumptrack from St. Isidore and relocate it back to Cecil Thompson Park.

At the regular meeting of Council on April 14, 2026, Council referred the location of the pumptrack to an upcoming GPC meeting to determine the most appropriate location.

POTENTIAL IMPLICATIONS

Financial Implications:

\$300,000 included in the 2026 capital budget for the pumptrack.

Policy and/or Legislative Implications:

None

Strategic Implications:

Providing opportunities for recreation and community togetherness.

Attachments:

None

REVIEWED AND APPROVED FOR SUBMISSION TO COUNCIL

Department Manager:

Cindy Millar

Date: June 2, 2026

**Chief Administrative
Officer:**

Cindy Millar 

Date: June 2, 2026



Request for Clarity

Governance & Priorities Committee - 12 Jun 2026

Topic: Strategic Priorities Chart Review Discussion - Regional Strategic Forum

Request: That Council provide direction to Administration on the Regional Strategic Forum that is currently on the 2026 Strategic Priorities Chart as a NOW project.

Background:

A Regional Strategic Forum is a NOW project on the 2026 Strategic Priorities Chart. The discussions around this topic were:

- Schedule a meeting with the 3 rural municipalities and the Town of Peace River
- What are our common areas of interest?
- What opportunities are there for resource sharing?
- What outcome(s) do we want to see?
- What would success look like?

As there are regional committees formed to focus on specific areas of interest: Peace Regional Energy Alliance (nuclear energy), Intermunicipal Peace River Regional Airport Committee, and beginning discussions on a regional Intermunicipal Collaboration Framework (ICF) Agreement, Administration is requesting direction from Council on what they would like to do regarding this item on the Strategic Priorities Chart (SPC). Some potential options are:

- Mark as Complete and indicate that the discussions are occurring through multiple committees and information will be brought to Council during a Council meeting.
- Leave it on the Chart as is and provide a new date for when Council would like to see action occur on this item, as well as updated direction on what they would like to have for topics of discussion.

POTENTIAL IMPLICATIONS

Financial Implications:

None at this time.

Policy and/or Legislative Implications:

None

Strategic Implications:

1. Regional collaboration that focuses on items of common interest to neighboring municipalities.

Attachments:

REVIEWED AND APPROVED FOR SUBMISSION TO COUNCIL

Department Manager:

Cindy Millar 

Date: June 1, 2026

**Chief Administrative
Officer:**

Cindy Millar 

Date: June 1, 2026



Request for Clarity

Governance & Priorities Committee - 12 Jun 2026

Topic: Strategic Priorities Chart Review Discussion - Intermunicipal Collaboration Framework with Town of Peace River

Request: That Council provide direction to Administration on the Intermunicipal Collaboration Framework (ICF) process with the Town of Peace River, currently on the 2026 Strategic Priorities Chart as a NOW project.

Background:

The Intermunicipal Collaboration Framework (ICF) process with the Town of Peace River is a NOW project on the 2026 Strategic Priorities Chart as the ICF agreement with the Town of Peace River has expired. The discussions around this topic were:

- Review of ICF Cost Sharing Agreements with the Town of Peace River
- Common areas of interest
- Voluntary resource sharing
- Joint strategy session with the Town of Peace River
- Mayor/Reeve - sit down and discuss what's happening in the region
- CAO's propose a timeline for ICF discussions
- Need financial transparency and accountability so that it's easily justifiable to County residents

At Council's direction, correspondence was sent to the Town of Peace River requesting a regional approach to the ICF agreements with the County of Northern Lights, the MD of Peace, Northern Sunrise County, and the Town of Peace River. The Town responded positively to this request and a meeting with the Mayor/Reeve, Deputy Mayor/Deputy Reeve, and the CAOs of the municipalities has been scheduled on July 15, 2026, for preliminary discussions on what success would look like, and how to structure the committee and process.

Based on the above, Administration would like direction from Council on what they would like to do regarding this item on the Strategic Priorities Chart. Some potential options are:

- Mark as Complete and indicate that the focus has shifted to regional negotiations
- Leave it on the Chart, mark it as ON HOLD for now, and remove the timeline on it due to the potential regional negotiations
- Leave it on the Chart as is and provide a new date for when Council would like to see action occur on this item, as well as updated direction on what they would like to have for topics of discussion.

POTENTIAL IMPLICATIONS

Financial Implications:

\$1,700,000 in the 2026 Operational Budget is paid to the Town of Peace River under the expired ICF agreement.

Policy and/or Legislative Implications:

1. *Municipal Government Act*, Revised Statutes Act of Alberta 2000, Chapter M-26, Section 708.28(1) Municipalities that have common boundaries must create a framework with each other by April 1, 2020 unless they are members of the same growth management board.

Strategic Implications:

1. Regional collaboration that advances intermunicipal fairness, transparency, financial responsibility, and accountability to residents.

Attachments:

None

REVIEWED AND APPROVED FOR SUBMISSION TO COUNCIL

Department Manager:

Cindy Millar



Date: June 1, 2026

Chief Administrative Officer:

Cindy Millar



Date: June 1, 2026



Request for Clarity

Governance & Priorities Committee - 12 Jun 2026

Topic: Strategic Priorities Chart Review Discussion - Service Level Review - Council Direction

Request: That Council provide direction to Administration on the Service Level Review - Council Direction that is on the 2026 Strategic Priorities Chart as a NEXT/LATER project.

Background:

The topic: Service Level Review - Council Direction is on the 2026 Strategic Priorities Chart as a NEXT/LATER project. The discussions initially centered around the impact of taxes. As Council knows, taxes are the major source of revenue for the County and the funds received from taxes pay for expenses and the delivery of services. When inflation goes up, so do the costs for the County to deliver services; as downloads continue from other levels of government, our costs to deliver these services go up as well. One way to increase the County's revenue is to review the level of services that we provide, and the level at which we provide them. Discussion then moved to the County's services and whether Council should review the services that are provided, and the level at which we provide them.

- Are the service levels too high?
- Are there efficiencies that could be found?
- Could we enter partnerships to provide services?
- Do we need to provide resources to ratepayers to show how their tax dollars are being spent?
- Could we do a capacity review for 2027?
- This could lead to a strategic priority (Budget/Services & Levels of same)

The last time that Council reviewed the services provided by the County was in 2020 as part of the 2021 Strategic Priorities workshop. This was a multi-day workshop that included staff, Council, and Management and was facilitated by Dr. Gordon McIntosh. Services provided by all departments were reviewed and were structured around What's Working Well and Areas for Attention. The Strategic Priorities Memo for that time is attached to this Request for Clarity.

Administration is requesting direction from Council on this topic. Potential options could be:

1. Include a Level of Service review on the 2027 Strategic Priorities Chart and include money in budget for a consultant to conduct an external review.
2. Include a Level of Service review on the 2027 Strategic Priorities Chart and include money in budget for a workshop similar to the one in 2020 led by Dr. Gordon McIntosh having participation by staff and Council.
3. Choose a list of specific services provided by the County that Council would like Administration to conduct an internal review on, such as snowplowing of private driveways, and provide an appropriate timeline for the review.

POTENTIAL IMPLICATIONS

Financial Implications:

None at this time. Future financial implications would be dependent on direction from Council.

Policy and/or Legislative Implications:

None

Strategic Implications:

1. Ensuring that the municipality is providing the services required to create and sustain safe and viable communities.

Attachments:

1. 2021 Strategic Priorities Chart Memo

REVIEWED AND APPROVED FOR SUBMISSION TO COUNCIL

Department Manager:

Cindy Millar 

Date: June 1, 2026

Chief Administrative Officer:

Cindy Millar 

Date: June 1, 2026



To: Council
From: Cindy Millar, CAO
Date: December 15, 2020
Re: Strategic & Service Initiative Workshop Update

The Strategic Priority and Service Initiative Workshops were held in October 2020 for Council and all staff to reflect on the strategic priority progress in 2020, review service capacity and identify areas for attention in 2021 and beyond. The session involved:

- Identification of strategic & service topics for discussion
- Exploration of strategic possibilities for strategic and service topics
- Confirmation of Council priorities and operational strategies for 2121.

STRATEGIC/SERVICES TOPICS

The following list of **Strategic Topics** for discussion identified by Council was generated from:

- An update on **current priorities**
- **2020 Now and Next Priorities** and *Advocacy Items* still in progress
- Additional topics raised by Council or management.

The list also contains service topics from the service review conducted by Council with management. This process involved:

- Inventory County functions with key activities for each service area
- Discussion of *what works well* and *areas for attention* in each service area
- Identification of service topics of interest with the following aims in mind:

SERVICE TOPIC CODES	
Save Costs	SC
Save Future Costs	SFC
Increase Revenue	IR
Alternate Provision	AP
Customer Service	CS
Saves Time	ST
Share Resources	SR
Legislative Compliance	LC
Transparency	TR
Increase Productivity	IP



STRATEGIC & SERVICE TOPICS LISTS

STRATEGIC TOPICS	SERVICE TOPICS
<ul style="list-style-type: none"> • MDP • Daycare • Cellphone • Broadband Strategy • Transportation Services (Community Van) • Land Use Bylaw • Committee Structure • Organizational Structure 	<ul style="list-style-type: none"> • Landowner Engagement • Cadotte Lake Garbage Pick Up Options • Software • Voyent Alert • Fees & Charges • Minimum Tax • Harmon Valley Winter Park Proposal • Tree/Land Clearing • East Peace Water Coop Agreement Review • Bylaw Enforcement • Communication • Drainage

STRATEGIC/SERVICES TOPICS

Each strategic and service topic was discussed (attachment 1) to determine:

- The **Key Question** to be addressed
- **Desired Outcomes** to be achieved if the question was addressed
- **Preferred Strategy** for implementation among the options identified
- **Key Action** Steps in 2021 for preferred strategies

STRATEGIC PRIORITIES

Council applied priority setting criteria to establish NOW (short term) Priorities and NEXT (longer term) Directions as well as ADVOCACY/PARTNER items requiring cooperation with and/or action by another agency. These items along with Operational Strategies are summarized in the Strategic Priorities Chart (attachment 2).

STRATEGIC POSSIBILITIES

STRATEGIC TOPIC	<i>Notes – Possibility & Follow-Up Item</i>
1. MDP	<ul style="list-style-type: none"> - Updated draft review for December 2020 – includes sections on <u>drainage, subdivisions, and trees/land clearing practices</u> - Open House – January 2021 - Consultation with landowners on drainage/land clearing - LUB Amendment triggered if necessary - <u>Final Reading/Passing of MDP – April 2021</u>
2. Day Care	<ul style="list-style-type: none"> - Budget 2021 discussion (building retrofit, \$ allocation, O&M, Program Delivery (PRCCA)) - Prompt for updated information
3. Cellphone	<ul style="list-style-type: none"> - (4) cell towers in 2021 budget discussions - Apply for additional grant funding where possible (already applied for CRTC grant) - <u>Conditions of the contract w/Telus – County use of towers, etc.</u> - Advocacy/partnerships with WCFN & Lubicon Lake Band
4. Broadband Strategy	<ul style="list-style-type: none"> - Develop a broadband strategy to present options to Council (delivery/partnerships available)
5. Transportation Services (Community Van)	<ul style="list-style-type: none"> - <u>Provide Council with a cost analysis – Van to continue providing service</u> - Explore diversification possibilities; alternate methods of delivery and maximize service use
6. Land Use Bylaw Amendment	<ul style="list-style-type: none"> - <u>Amend Land Use Bylaw if required after MDP update</u> - <u>Include private landowner tree cutting</u>
7. Committee Structure	<ul style="list-style-type: none"> - <u>Conduct a review of the County's Committees Boards and Structures</u>
8. Organizational Structure	<ul style="list-style-type: none"> - <u>Conduct a review of the County's organizational structure</u>

SERVICE POSSIBILITIES

SERVICE TOPIC	<i>Notes – Possibility & Follow-Up Item</i>
a. Landowner Engagement	<ul style="list-style-type: none"> - <u>Create a Procedure for landowner engagement regarding access to/or work to be done adjacent to said landowner, include confirmation of same by landowner</u> - Meaningful engagement – works/liaisons; local/technical expertise
b. Cadotte Lake Garbage Pick-Up Options	<ul style="list-style-type: none"> - RFP - <u>Provide a report to Council with options – user fees, cancel service, use a contractor, etc.</u>
c. Software	<ul style="list-style-type: none"> - <u>Review County software and look for options for efficiencies, compatibility, etc.</u>
d. Voyent Alert	<ul style="list-style-type: none"> - <u>Continue to increase resident subscription to Voyent Alert</u>
e. Fees & Charges	<ul style="list-style-type: none"> - Revenue gap, fairness, cost recovery - How do we enhance revenue, ensure cost recovery while addressing special needs? - <u>Review fees and charges and bring a report back to Council</u>
f. Minimum Tax	<ul style="list-style-type: none"> - What would Council need to know? – # of accounts below a certain \$ amount, administration costs, how do other municipalities handle this, do we have authority to do this under the MGA? - <u>Create a report for Council to consider a Minimum Tax for the County</u>
g. Harmon Valley Park Winter Use Proposal	<ul style="list-style-type: none"> - Increase access for users year-round, ensuring safety and control - Check: liability, staff costs, and determine level of service you want to provide - <u>Create a report for Council to consider winter use of HV Park in 2021</u>
h. Tree/Land Clearing	<ul style="list-style-type: none"> - Conduct research, look for good practices/consult with landowners then decide what to do - Impact of private landowners on County infrastructure and services
i. EPWC Agreement Review	<ul style="list-style-type: none"> - Good traffic flow, readiness for growth, multi-modal system/design - Review Agreement – hotspots (value for \$, system, fiscal accountability, concerns, enforcement) - <u>Meet with Coop and update agreement to bring to Council</u>
j. Bylaw Enforcement	<ul style="list-style-type: none"> - Is a Policy for Bylaw Enforcement needed? - Review bylaws – how many do not have resources or personnel to enforce? Provide a report to Council - Awareness/Implications – education program rather than attached with fines - Awareness for development permits - Education for animal control

SERVICE TOPIC	<i>Notes – Possibility & Follow-Up Item</i>
k. Communication Tools	<ul style="list-style-type: none"> - Look at methods and see where the gaps are - Dedication; coordination, resources - Public awareness, workload, timely, multi-medium - <u>Audiences/Mediums: = time%, position/contractor, etc.</u>
l. Drainage	<ul style="list-style-type: none"> - <u>Update Map including classification/volume of water and Hot Spots</u>

STRATEGIC PRIORITIES

Council applied priority setting criteria to establish NOW (short term) Priorities and NEXT (longer term) Directions as well as ADVOCACY/PARTNER items requiring cooperation with and/or action by another agency. These items are summarized in the Strategic Priorities Chart (attachment 2).

2021 STRATEGIC PRIORITIES CHART
Draft – October 30, 2020

COUNCIL PRIORITIES (Council/CAO)	
NOW 1. MDP: DRAFT/OPEN HOUSE – Draft - December/Open House - January 2. DAYCARE FEASIBILITY - November 3. CELL PHONE TOWERS/HIGH SPEED INTERNET - December	
ADVOCACY / PARTNERSHIPS <ul style="list-style-type: none"> • <i>Northern Transmission</i> • <i>Woodland Cree First Nation Protocol (Cell)</i> • <i>Lubicon Lake Band Protocol (Cell)</i> • <i>Medical Clinic</i> • <i>Little Buffalo Lagoon Transfer</i> • <i>Ortho Mapping (Province)</i> • <i>IDP: Drainage (MD of Smoky River No. 130)</i> • <i>East Peace Water Co-op Agreement Review</i> • <i>RCMP: Concerns</i> 	NEXT <ul style="list-style-type: none"> • HARMON VALLEY WINTER PARK PROPOSAL • MINIMUM TAX FEASIBILITY • BOARDS & COMMITTEES REVIEW • DRAINAGE SYSTEM REVIEW
OPERATIONAL STRATEGIES (CAO/Staff)	
CAO	ECONOMIC DEVELOPMENT (Lynn)
1. BOARDS & COMMITTEES REVIEW: List – January 2. FEES & CHARGES BYLAW REVIEW - March 3. Inter-department Collaboration Strategy – December 2020 <ul style="list-style-type: none"> • Organizational Structure: Review • Bylaw Enforcement Review 	1. CELL PHONE TOWERS – December 2. “How To” Videos List/Funds – January 3. Trails & Parks Promotion - May <ul style="list-style-type: none"> • Internet Broadband Exploration
ENGINEERING (Ian)	AGRICULTURAL SERVICES (Sebastian)
1. MDP: DRAFT/OPEN HOUSE – Draft - December/Open House - January- 2. DRAINAGE SYSTEM REVIEW 3. Landowner Contact: SOP – March <ul style="list-style-type: none"> • GIS/GPS Mapping: Data Entry Program/Process • Directory of Contractors/Approved Vendors to each department 	1. HARMON VALLEY WINTER PARK PROPOSAL 2. Code of the North – March 3. Building Expansion Options – March <ul style="list-style-type: none"> • Mowing Right of Way
FINANCE (Bob)	COMMUNITY SERVICES (Amber)
1. Asset Management Plan – September 2. Receivables Collections Strategy - August <ul style="list-style-type: none"> • Small Business Tax Rate - April 	3. DAYCARE FEASIBILITY - November 2020 4. Mental Health Support: Analysis – March 5. Communication Tools: Assessment – April <ul style="list-style-type: none"> • Transportation Review – June • Trail/Park Programs - May
ASSESSMENT (Rod)	LEGISLATIVE SERVICES (Olive)
1. MINIMUM TAX FEASIBILITY – July	1. Consent Agenda & Procedural Bylaw Review - February 2. Software Programs: Envelope and Proposal - December <ul style="list-style-type: none"> • Position Handbooks: SOP’s – June
PUBLIC WORKS (Mike K)	PROTECTIVE SERVICES (Dave)
1. Trails/Parks Signage Program: Proposal – December 2. East Peace Water Co-op Agreement Review – February <ul style="list-style-type: none"> • Shoulder Pull Program 	1. EMP Review/ Plan Tabletop Exercise – January 2. RCMP Service Review - February

KEY: BOLD CAPITALS = Councils NOW Priorities; *Italics* = Councils Advocacy Issues; **CAPITALS** = Councils NEXT Priorities; Regular Title Case = Staff Operational Strategies



Request for Clarity
Governance & Priorities Committee - 12 Jun 2026

Topic: Policy 1.6 Donations and Sponsorship

Request: That Council review Policy 1.6 Donations and Sponsorship and provide direction to Administration on how they would like to proceed.

Background:

At the April 14, 2026 regular Council meeting, Council directed Administration to include Policy 1.6 Donations and Sponsorships on the next Governance & Priorities Committee meeting agenda for review and discussion. Administration has attached examples of similar policies and programs from other municipalities, including the Community Assistance Grant Policy from the County of Grande Prairie No. 1, the Council Donation Policy from the County of Northern Lights, and the General Grants Policy from Birch Hills County. These examples are provided for reference and comparison purposes as Council considers whether amendments to Policy 1.6 may be necessary

POTENTIAL IMPLICATIONS

Financial Implications:

None

Policy and/or Legislative Implications:

1. Policy 1.6 Donations and Sponsorships

Strategic Implications:

None

Attachments:

1. Policy 1.6 Donations and Sponsorships
2. County of Grande Prairie No. 1, Community Assistance Grant Policy
3. County of Northern Lights Council Donation Policy
4. Birch Hills County General Grants Policy


REVIEWED AND APPROVED FOR SUBMISSION TO COUNCIL

Department Manager:

Jocelyn Tangen 

Date: June 4, 2026

Chief Administrative Officer:

Cindy Millar 

Date: June 4, 2026

POLICY 1.6
Donations and Sponsorships



**NORTHERN SUNRISE
COUNTY**

Department: Administration

Date Approved: February 25, 2025

Rescinds: 314/05/10/22

Council Res. No: 128/02/25/25

PURPOSE

To establish guidelines for Northern Sunrise County (County) when making donations and sponsorships.

SCOPE

This policy applies to all County donations and sponsorships.

GUIDELINES

General:

1. Council shall annually establish a budget for donations and sponsorships.
2. Council is responsible for approving requests for donations and sponsorships.
3. Council may approve all, part, or deny any request received.
4. Council may, at their discretion, request volunteer hours in return for the funds received.
5. If the event or project for which the funds were donated does not occur within the calendar year that the funds were advanced, the funds must be returned to the County.
6. Organizations receiving donations and sponsorships of \$1,000 or more will be required to provide a report to Council on how the funds were utilized no later than 90 days after the funds have been expended. If the report to Council is not completed, future requests for funding will be denied.
7. A tally of donations and sponsorships shall be maintained by the County.

Approval for Requests for Promotional Material:

1. Requests for promotional material will be approved by the CAO subject to availability.

Approval for Request for Gift in Kind:

1. Requests for use of County equipment, facilities or manpower shall be approved by the Council subject to availability of resources.

Application Process:

1. To be considered, funding applications must be completed on the "Donation Request" application form available from the County's website.
2. Applicants may be requested to provide financial statements.
3. Applicants are invited to attend a Council meeting to answer any questions related to their request for funding, or to discuss their application in detail.

Community Halls within the County:

1. Non-profit community hall organizations within the County must apply annually for sponsorship of events, in conjunction with Policy 1.5 Community Halls Support application for financial assistance.



Reeve



Chief Administrative Officer



Community Assistance Grant

Parks and Recreation
Policy K6

Policy:	K6 – Community Assistance Grant
Policy Department(s):	Parks and Recreation
Adoption Date:	December 6, 2004
Adoption Reference:	12/1283/2004
Effective Date:	December 6, 2004
Last Amended:	December 12, 2022

Policy Purpose

The purpose of this policy to define the process by which the County of Grande Prairie No. 1 provides Community Assistance funding and/or donations of items other than cash to support operating costs, fundraising endeavors, achievements, and milestones associated with the delivery of programs, services and events by organizations and groups that operate on a not-for-profit basis. This includes requests that promote active, safe and sustainable communities and improve quality of life in the County.

Policy Statement

The County of Grande Prairie No. 1 is committed to ensuring that recreational, cultural and community improvement programs and opportunities are available to meet the needs of County residents.

The following Community Assistance streams are available under this grant program:

- **Multi Year Operating Funding:** For organizations and facilities that contribute to the quality of life and enhance livability that fall outside Policy K14 which covers halls, arenas and curling rinks.
- **Community Wellness & Safety:** For groups or organizations that undertake protective measures to respond and protect the community from harm or contribute in providing a safe and healthy community. Also, groups or organizations that foster connections among people through socially inclusive services with a diverse offering of cultural and recreational opportunities, outside of Family Community Support Services mandates.
- **Event Sponsorship, Donations & Community Support:** For groups or organizations that provide County residents with cultural and recreational opportunities or contribute to the quality of life and enhance the livability of the community can apply for event sponsorship or other emergent support or funding needs. Events or groups that fundraise to disperse funding raised to other organizations are not eligible for this grant program.



Community Assistance Grant

Parks and Recreation
Policy K6

- **Country Agricultural Fairs:** As governed by Policy K19 - an exhibition or event that is intended to promote agriculture by including a variety of exhibits of livestock and /or agriculture products.
- **Neighbourhood Ice Surfaces:** As governed by Policy K11 - any temporary, outdoor natural ice surface set up for the winter season on a Municipal Reserve greenspace within a neighbourhood or subdivision. The ice surface could have low board edge or a snowbank edge.

Definitions

“Capital” means any tangible asset with an estimated useful life exceeding one year, including:

- Land or Buildings;
- Facility Construction, renovation or repair;
- Facility assessment, study, design or construction documents to support the above projects;
- Furnishings and/or equipment for use at community operated facilities; and
- Site improvements.

“Council” means the duly elected Council members of the County of Grande Prairie No. 1

“County” means the municipality of the County of Grande Prairie No. 1 having jurisdiction under the Municipal Government Act and other applicable legislation.

“Donation” means a gift for charity, humanitarian aid or to benefit a cause without a return consideration. It may take various forms including money, aims, services or goods. Charitable donations of goods or services are also called gifts in kind. Gifts or gifts-in-kind may include gift baskets, County swag and event tickets.

“Emergent” is considered an unforeseen situation or outcome where urgency exists and the situation must be dealt with in a timely manner. To meet this criteria within this policy, an applicant must be prepared to defend the situation as being emergent.

“Grants” are non-repayable funds or products disbursed by Council to a recipient. Under this policy it is often a non-profit entity, local organization or volunteer group that provides recreation or cultural programs and opportunities that benefit County residents.

“Operating” means funding or projects related to maintaining or enhancing operations that are not directly related to infrastructure.

“Sponsorship” means the act of supporting an event, activity, person or organization financially or through the provision of products or services with an expectation of corporate recognition.

Policy Guidelines

1. Funding



Community Assistance Grant

Parks and Recreation
Policy K6

- 1.1. County Council will identify a Community Assistance grant funding budget during the annual budget process. Financing for the grant will come from general revenues or other funding sources as determined by County Council.
 - 1.2. Each year, the Community Assistance grant program has the following sub sections within the grant line to direct the distribution of funds:
 - 1.2.1. Multi-year funding (specific term) - approved by Council Motion.
 - 1.2.2. Community Assistance - to support applications throughout the year (allocated amount with 3% escalator each year with a maximum budget of \$100,000).
 - 1.2.3. Community Wellness and Safety - to support applications throughout the year.
 - 1.2.4. Country Agricultural Fairs.
 - 1.2.5. Neighbourhood Ice Surfaces.
 - 1.3. Any Community Assistance grant funds initially budgeted but not allocated (undersubscribed) during the fiscal year (to a maximum of \$20,000) can either be transferred to the Community Grants Reserve or otherwise through a motion by Council.
 - 1.4. If Community Assistance grant funds are depleted before the end of the fiscal year, Council can make a motion to supplement the funds for an agreed amount from the Community Grants Reserve or another source.
2. Applications for Funding
- 2.1. Applications must be received in the prescribed form by the specific deadlines:
 - 2.1.1. **New Multi Year Funding Requests:** Submitted a minimum of 60 days and must use Community Assistance grant portal on website.
 - 2.1.2. **Renewing Multi Year Funding Requests:** Submitted a minimum of 60 days and may submit by email to Administration via: parksandrecreation@countygpr.ab.ca
 - 2.1.3. **Community Safety and Wellness:** Submitted a minimum of 45 days prior to event date or program start and must use Community Assistance grant portal on website.
 - 2.1.4. **Sponsorship, Donations and Community Support Requests:** Submitted a minimum of 45 days prior to event date and must use Community Assistance grant portal on website. Funding requests over \$10,000 will be required to have a delegation to present to Council.



Community Assistance Grant

Parks and Recreation
Policy K6

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- 2.1.5. **Country Agricultural Fairs:** Submitted a minimum 90 days prior to event date and may submit via email to Administration via: parksandrecreation@countyp.ab.ca
 - 2.1.6. **Neighbourhood Ice Surfaces:** Submitted by November 30 each year via the application form on County website.
 - 2.1.7. **Emergent Operating Funding Requests:** Will be prioritized by Administration and scheduled at the next available Council meeting.
 - 2.2. Applications that are received after the deadline may be considered pending approval by the CAO or Director of Community Services.
 - 2.3. Issues of an emergent nature may be submitted year-round to County Administration to be presented to Council.
 - 2.4. Applications for assistance must demonstrate that the opportunities being provided are open for the use and enjoyment of County residents. If user fees are charged, all users will be charged at the same rate. Preference will be given to projects that:
 - 2.4.1. Benefit a large number of County residents
 - 2.4.2. Provide evidence that there is a large volume of volunteerism and/or fundraising
 - 2.4.3. Demonstrate success in achieving project or program goals
 - 2.4.4. Include a well-organized business plan that includes performance measures.
 - 2.4.5. Applications should not duplicate or compete with existing recreational or cultural opportunities unless there is a definite need or benefit to be achieved.
3. Distribution of Funds
 - 3.1. Successful applicants for Multi-year operational funding will be released to organizations in late June/early July. Requests for early release of funds can be submitted to Administration for approval by the Community Services Director.
 - 3.2. Upon approval by Council, successful applicants for sponsorship, operational or emergent funding will receive funds within two business weeks or less.
 4. Reporting Compliance Requirements
 - 4.1. Organizations receiving Community Assistance funding over \$1,000 will be required to submit a written report that shows outcomes and includes a financial account of the funds expended and net proceeds for fundraising events.
 - 4.2. Organizations receiving Multi-Year operational funding are expected to provide an annual report to Administration and / or present to Council as requested.



Community Assistance Grant

Parks and Recreation
Policy K6

5. Risk Management & Insurance Considerations
 - 5.1. All grant recipients must be willing to undertake a review process if requested by the County's Risk Management & Insurance Coordinator to ensure that insurance compliance and best practices are being followed.
6. Recognition
 - 6.1. All grant recipients must publicly recognize the contributions that the County made to their project in accordance with the County's Recognition guidelines.

Attachments

N/A

References

Legal Authorities	Municipal Government Act, RSA 2000, c M-26 Freedom of Information and Protection of Privacy Act
Related Plans, Bylaws, Policies, Etc.	Policy B1 – Policy Development Policy C27 – Financial Reserves Policy Policy K2 – 100 th Anniversary Grant Funding Policy K10 – Capital Grant Policy K14 – Operating Assistance – Facilities Grant Policy K19 – Country Agricultural Fairs Policy S2 – Public Relations, Promotions and Donations
Other	Community Assistance Grant Portal

Revision History

Review Date	Description
December 12, 2022	Reviewed and Amended CM20221212.007
January 20, 2020	Reviewed and Amended CM20200120.003
March 7, 2016	Reviewed and Amended CM20160307.1015
December 6, 2004	Adoption Date CM12/1283/2004

COUNCIL DONATIONS POLICY

Subject: Donations Ref: Council Code: 15

Date Approved: 13 December 2017 Motion No: 551/13/12/17 Replaces: 706/17/10/06;
275/25/06/13

The Council of the County of Northern Lights believes in accommodating requests for donations from non-profit groups and organizations that provide services or programming to County residents.

The Council proposes to do this through the setting aside of budget dollars annually and implementing guidelines for donations so as to ensure that funds being provided are done so in a manner that is fair and consistent.

Signed: 
Chief Elected Official

Signed: 
Chief Administrative Officer

Procedure

1. Donations are considered to be a gift from the County with no expectation of reciprocation. They are provided for charitable purposes or to assist with a specific cause that is minor in nature.
2. Donations under the policy can be cash offerings or gifts in kind such as donated services, equipment or labour.
3. The limit for cash offerings under this policy is \$2,500.00 and the limit for gifts-in-kind is \$10,000.00. Donations to other municipalities under this policy are exempt from these limits.
4. As part of the budget process, Council will instruct administration to set aside a portion of the operating budget to accommodate requests for donations.
5. Only non-profit groups & associations, charitable organizations and other governments will be eligible to receive funding under this policy. All groups shall provide an identifiable benefit to the residents of the County in order to be considered.
6. Groups seeking a donation for their event or cause are requested to seek funding through the County's recreation boards, prior to seeking funding from the County. Under special circumstances requests may be forwarded to council directly.
7. All donation/funding requests are required to be accompanied by a completed application (Appendix A) in addition to any other information that the group feels appropriate. This application will outline the cause, other sources of funding, previous funds received from the County as well as outline the benefit of the event, service or program for County residents.
8. All requests that are complete and \$500 and under can be approved by the CAO or designate. Requests exceeding this amount will be forwarded to Council for a decision.
9. Donations approved by the CAO will be reported to Council in the meeting following the approval, whenever practical.
10. Completed donation/funding requests will be submitted to Council by Administration in a timely manner so as to ensure the request is not presented after the event or the reason for the request lapses.
11. Organizations will be notified of the funding decision in writing as soon as it is practical to do so.
12. Organizations wishing to deviate from their proposal for which the funds were donated must obtain written approval from Council to expend any funds.
13. Any donations or funds provided through this policy will be coded as a grant under the appropriate County department wherever possible to ensure proper financial recording.
14. Council can request Administration to provide a report listing the recipients and the amounts received at any time.



APPENDIX A

REQUEST FOR FUNDING – COUNCIL DONATIONS & GRANTS
Application Form

APPLICANT INFORMATION

Legal Name of Organization/Individual (*must match provincial records*):

Common Name of Organization/Individual (*if different from legal name*):

Mailing Address of Applicant Organization/Individual: _____

** All correspondence and cheques will be mailed to this address.

City: _____ Province: _____ Postal Code: _____

Contact Person: _____ Position: _____

Phone Number: _____ Email: _____

PROJECT OVERVIEW

Activity / Event Type (please check one)

- Hosting a Regional, Provincial, National or International Event
- Community Special Event or Celebration
- Organization/Group Start-up Costs
- Travel to a Regional, Provincial, National or International Event
- Other: Specify _____

Project Name: _____ Amount Requested: \$ _____

Description of request: (use back of form if more space is required) _____

How will you acknowledge support from the County of Northern Lights?

Did you approach any other organizations about funding? Yes* No

Did you approach the North or South Recreation Boards for funding? Yes* No

*If yes, did you receive funding from them for this project, event or activity? Yes** No

** What was the Amount received? _____

PROJECT BUDGET

Please list sources of revenue and anticipated expenses for the activity /event.

Revenues:

Applicant Fund-raising: _____

Applicant Contribution: _____

Other Grants/Donations: _____

In-kind Contributions: _____

Other: _____

Application Amount: _____

Expenditures

Transportation: _____

Accommodations: _____

Contracted Services: _____

Food: _____

Administration: _____

Other: _____

Total Revenue: _____

Total Expenditures: _____

Revenues & Expenditures must match.

Please Submit Applications To:

County of Northern Lights
600 – 7th Ave NW, Box 10
Manning, AB T0H 2M0
Fax: 780-836-3663

cao@countyofnorthernlights.com

The personal information collected on this form is collected for the purpose of determining eligibility for the applicant to receive support for an event or activity. The information is collected under Section 33(c) of the Freedom of Information and Protection of Privacy Act. Questions regarding the collection of this information should be directed to the above address.

For Administrative Use Only:	
Date Received: _____	Date Reviewed: _____
Funding Approved: No <input type="checkbox"/> Yes <input type="checkbox"/>	Amount approved for: \$ _____
Funding Type: Donation <input type="checkbox"/> or Grant <input type="checkbox"/>	Council Motion #: _____
Department (for budget purposes): _____	
Comments: _____	



POLICY

Department: Council	Policy No. 01-11-25	Page 1 of 12
Policy Title: General Grants	Date: January 14, 2025	Resolution No.

Purpose: Birch Hills County's General Grants Policy is used to provide guidance on how to process requests received by the County from community organizations for monetary assistance. Birch Hills County may provide grants to community groups, service clubs, events or organizations.

1 **DEFINITIONS**

For the purposes of this policy, the following terms are defined:

- 1.1 **Community Organizations** means any organization operating within or near County boundaries.
- 1.2 **County** means Birch Hills County
- 1.3 **Not-for-Profit** means an organization that is a non-profit organization as defined in the Municipal Government Act, Section 241 (f), or federally registered as a charity.

2 **GENERAL PROVISIONS**

- 2.1 Council may annually during budget deliberations, establish an exact budget for general grants.
- 2.2 Council may maintain a reserve to assist community organizations.
- 2.3 The County may sponsor events organized by, or on behalf of, not-for-profit organizations located and operating in or around Birch Hills County through:
 - 2.3.1 Event sponsorship, either in the form of a cash donation or by paying for event expenses including coffee breaks, meals, etc.;
 - 2.3.2 Purchase of a table or booth at which representatives of the County will promote the County or County events;
 - 2.3.3 Payment for the advertisement of the County in event materials including posters, handouts, brochures, etc.; or
 - 2.3.4 Other forms as requested and deemed appropriate.



P O L I C Y

Department: Council	Policy No. 01-11-25	Page 2 of 12
Policy Title: General Grants	Date: January 14, 2025	Resolution No.

3 GUIDING PRINCIPLES AND CRITERIA/ELIGIBILITY

- 3.1 General Grants must align with the County's vision and goals that build the community and support community organizations, neighbors, and volunteerism.
- 3.2 General Grants must directly benefit the community group, service club, not-for-profit or organization submitting the application.
- 3.3 The applicant must be a responsible and reputable community group, service club, or organization whose name and identity is in good standing in the community. The applicant's past performance in achieving program objectives shall be considered.
- 3.4 Applicant must be able to supply budget information.
- 3.5 Sponsorship of the event must provide opportunities for the County to be recognized.

4 EXCLUSION FROM FUNDING

- 4.1 Funding provided under this grant program must not provide primarily for the recreational needs or leisure time pursuits of individuals, offer direct assistance (including money, food, clothing or shelter) to sustain an individual or family, or duplicate services that are ordinarily provided by a government or government agency.
- 4.2 The following types of organizations will not be considered for funding:
 - 4.2.1 Individuals or private foundations/clubs;
 - 4.2.2 For-profit organizations;
 - 4.2.3 Political organizations and candidates.
- 4.3 Applications will be given preference from a community group, service club, or organization that has not received, or has not applied for funding from the Recreation Grant Program.

Two handwritten signatures in blue ink, one appearing to be a stylized 'D' and the other a more complex signature.



POLICY

Department: Council	Policy No. 01-11-25	Page 3 of 12
Policy Title: General Grants	Date: January 14, 2025	Resolution No.

5 REQUEST PROCESS

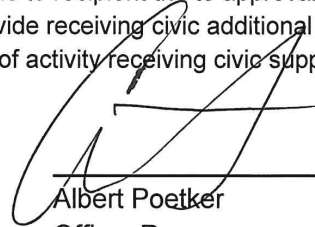
- 5.1 Requests for a grant may be made year-round with priority given to early applicants. Requests must be submitted yearly for review.
- 5.2 All requests must be made utilizing the form provided at Schedule A, submitted by email, mail, fax, or hand delivered to the County Office
- 5.3 Each request must demonstrate the need for the specific request and identify a specific benefit and outcome.
- 5.4 The County Council will have final approval authority, and the decision cannot be appealed.
- 5.5 Priority will be given annually to new applicants for purposes or events not previously funded.
- 5.6 Applications will only be considered if funding is still available.
- 5.7 Administration will notify applicants in writing (regular mail or email) of the outcome of their submission.

6 CONDITIONS OF APPROVAL

- 6.1 Council may attach conditions to the approval of funding under this policy Council which may will attach require conditions the to recipient the to approval perform of certain funding under activities this or provide receiving civic additional support. information in connection with the project of activity receiving civic support.



 Larry Davidson
 Chief Administrative



 Albert Poetker
 Officer Reeve

Adopted by Council: January 28th, 2025
 Date: January 29th, 2025



**NORTHERN SUNRISE
COUNTY**

Northern Sunrise County

Briefing Note

To:	Council	From:	Cindy Millar
Date:	June 12, 2026	Topic:	Bill 28, the Municipal Affairs and Housing Statutes

On April 2, 2026, the Government of Alberta released Bill 28, the Municipal Affairs and Housing Statutes Amendments Act, 2026. The Bill received Royal Assent on May 14, 2026. Many of these amendments rely on regulations that have not yet been released. As such, the full impact of several of these changes remains uncertain.

The Rural Municipalities of Alberta and Alberta Municipalities have each conducted analyses of Bill 28, including concerns, which are attached for Council's review. The Coalition of Alberta Public Libraries has also provided its view on the changes that will impact public libraries, which is also attached.

While each document provides an in-depth analysis, Administration would like to highlight a few of these changes that may have implications for the County.

1. **Reduced Municipal Planning Authority.** Several amendments would allow the Province to override or direct municipal planning decisions. These changes may reduce the County's ability to make planning decisions that reflect local priorities, environmental considerations, and rural development patterns.
2. **Aggregate Pit Approvals.** Amendments provide greater authority to the Province and may limit the County's ability to manage land-use conflicts, road impacts, environmental considerations, and residents' concerns regarding aggregate developments.
3. **Financial Impacts and Cost Recovery.** Amendments expand exemptions from off-site levies and restrict how levy revenues may be used. Although the County doesn't rely heavily on off-site levies, they still reduce local financial flexibility. There are also uncertainties and potential financial implications related to the seniors lodge reserve funds and potential requisition requirements.
4. **Increased Provincial Oversight.** Amendments reflect a trend towards increased provincial involvement in traditionally municipal matters. This is a continued shift away from local decision-making.
5. **Councillor Accountability Framework.** This is one of the positive aspects of the amendments, although details are still pending through the regulations.
6. **Public Disclosure of Municipal Official Salaries.** This is a large concern for the safety and well-being of the staff. We are a very small organization, and all of our staff are known within the community, which may hinder recruitment and/or retention of staff.
7. **Public Libraries and Municipal Utilities.** Amendments include additional provincial oversight related to public libraries and the ability for Cabinet to transfer ownership of a public utility to a public utility entity, with the details subject to the development of regulations. There is not



**NORTHERN SUNRISE
COUNTY**

Northern Sunrise County

Briefing Note

enough information in this, and without the regulations, there is a lot of speculation about how / why this would come into play.

In conclusion, Bill 28 introduces several significant legislative changes that may affect the County's planning authority, financial flexibility, and local decision-making autonomy, while also increasing provincial oversight in areas traditionally managed by municipalities. Although some elements, such as the proposed Councillor accountability framework, may offer benefits, the full implications of the amendments remain unclear until the supporting regulations are released. Administration would like Council to review the information provided and offer feedback and direction.

From: municipalservicesdivision@gov.ab.ca <municipalservicesdivision@gov.ab.ca>
Sent: May 19, 2026 12:35 PM
To: Cindy Millar <cmillar@northernsunrise.net>
Subject: Municipal Affairs and Housing Statutes Amendment Act, 2026

I am pleased to share that Bill 28, the *Municipal Affairs and Housing Statutes Amendment Act, 2026*, received Royal Assent on May 14, 2026. Bill 28 made amendments to the *Municipal Government Act* to modernize municipal rules, improve clarity and consistency, and strengthen service delivery.

The changes focus on the following themes:

- growth and housing – how communities expand;
- assessment and property tax – how services are paid for fairly;
- governance and accountability – who is responsible and to whom;
- municipal transparency – how municipalities make decisions and operate day to day; and
- public institutions and municipal utilities – how essential public services are governed and protected.

Together, these five themes are aimed at modernizing municipal legislation, clarifying local governance, and supporting communities across Alberta.

Growth and Housing

The amendments will accelerate construction to build more homes faster, improve transparency, reduce red tape, and streamline municipal approvals by:

- supporting the use of automated permitting tools;
- clarifying costs that cannot be included in off-site levy charges; and
- requiring permit timeline reporting to be posted on municipal websites.

Amendments related to “Automatic Yes” frameworks will encourage municipalities to fast-track low-risk development permits, increasing predictability for builders and helping accelerate housing construction across Alberta.

In addition, charter schools will be treated consistently with other publicly funded schools by enabling access to municipal and school reserve land.

The changes will also allow the Minister of Municipal Affairs to set requirements for community design codes that municipalities may choose to adopt, helping streamline

approvals for developments that meet established land-use and design standards while preserving local decision-making.

Assessment and Property Tax

The proposed legislative amendments implement some of the decisions from the recently completed policy phase of the Assessment Model Review. These decisions lay the foundation to modernize the regulated property assessment system and promote fairness for municipalities and industries by:

- clarifying the rules that determine which costs are assessable, which will improve consistency and reduce assessment appeals;
- enabling greater use of standardized rates for regulated properties, which will increase predictability and efficiency of assessment;
- applying penalties to property owners who fail to report timely property information; and
- establishing a regular cycle for review of assessment models.

Details about the outcomes of the policy phase of the Assessment Model Review were sent to you under separate cover, if your organization is directly affected.

Using the updated rules and policies, new models for assessing individual types of regulated properties will now be developed to better reflect current costs, technology and construction practices. The work for this next phase of the Assessment Model Review will be undertaken over the next two years, and will continue to involve significant input from municipal, industry and assessment stakeholders.

Governance and Accountability

The legislation strengthens accountability and integrity in local government by creating a provincial councillor accountability framework. The framework will establish processes to address pecuniary interest, improper use of influence, unauthorized use of municipal assets and services, disclosure of confidential information, and egregious behaviour.

Under the new framework, complaints will be investigated by an independent third-party chosen from a provincial roster by the municipality, ensuring impartial, timely resolution of issues before they escalate, and a roster of commissioners will also be appointed by the province to hear appeals.

In addition, the legislation updates the process for viability reviews.

Municipal Transparency

The legislative changes will improve transparency by requiring municipalities to publicly disclose the salaries of municipal employees above a specified threshold, aligning municipal practices with Alberta's own disclosure standards.

In addition, the amendments will allow rural, small urban, and specialized municipalities to show policing costs as a separate line on property tax notices, improving transparency for residents.

A province-wide framework for councillor information requests will assure timely access to information and consistent sharing of broader information with all councillors to strengthen the ability to make informed decisions. Councils will have the ability to adopt local policies to manage significant information requests in a practical, sustainable way.

The legislative changes also modernize governance and operations of business improvement areas, including flexibility for interim board appointments, electronic notifications, and in-year budget changes to reduce red tape, improve flexibility and help commercial districts stay vibrant and responsive to local needs.

Public Institutions and Municipal Utilities

The amendments enable Cabinet to require that municipalities transfer control and operations of a municipal public utility to a regional services commission or a controlled corporation, should it be deemed necessary to do so.

Unless stated otherwise, most of the proposed amendments would come into force immediately when the Bill becomes law. This includes changes related to growth and housing, governance and accountability, and municipal transparency. Updates to the regulated property assessment framework are proposed to take effect on January 1, 2027.

Further clarification and implementation of this Act are anticipated to come into effect via regulations which are anticipated to be in place in the coming months. These include amendments to both the City of Calgary and City of Edmonton City Charters, the Business Improvement Areas Regulation as well as regulatory amendments related to the assessment model review, and non-statutory studies. A regulation to implement the councillor accountability framework is anticipated to be brought forward later in 2026.

Further information on Bill 28 can found here: [Modernizing municipal legislation across the province | Alberta.ca](#). Several fact sheets are being developed to support municipalities in implementing the changes and will be posted online in the coming weeks.

Jonah Mozeson

Deputy Minister



Bill 28:
***Municipal Affairs and
Housing Statutes
Amendment Act, 2026***
- RMA Analysis

April 2026

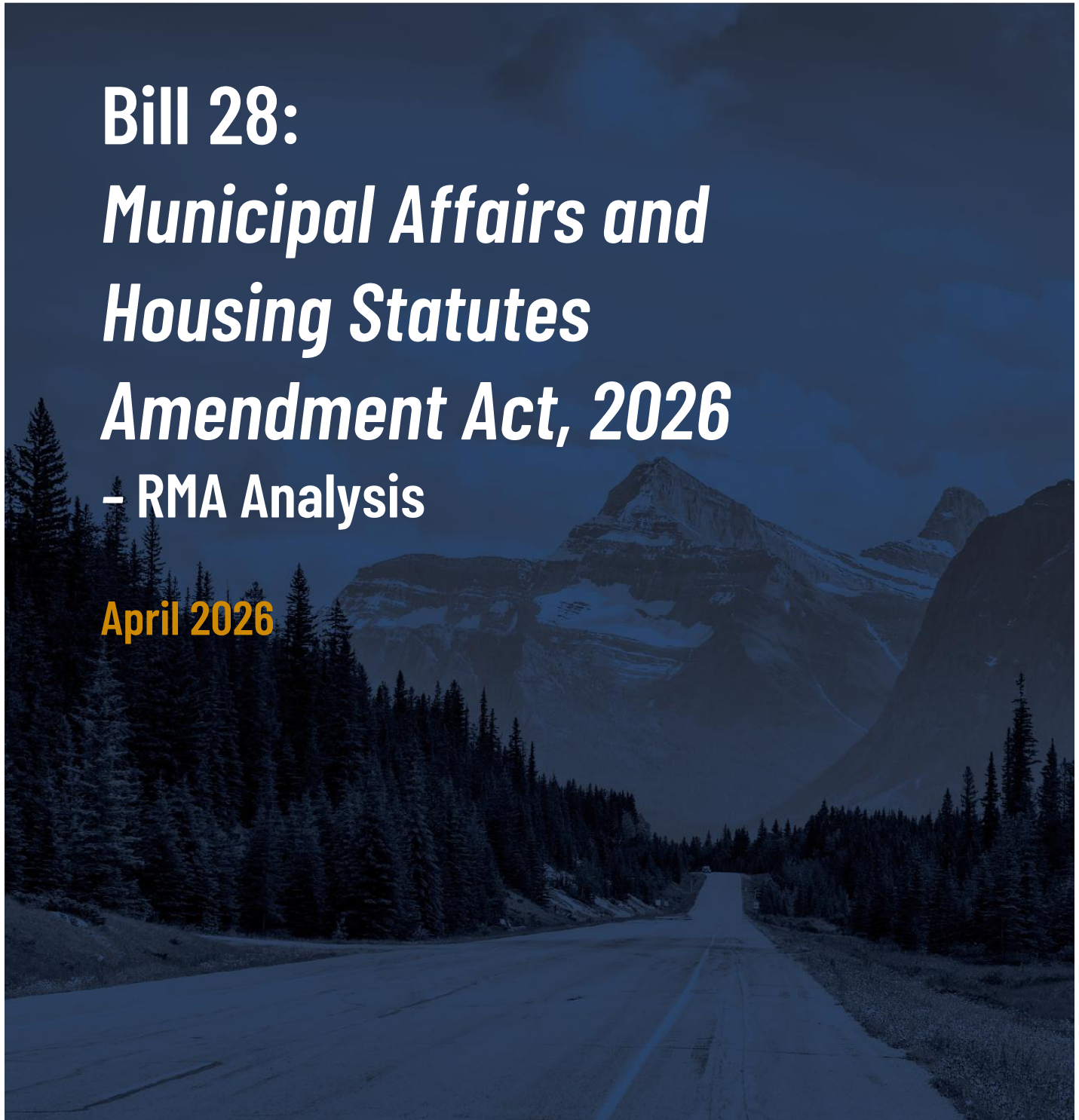


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Bill 28 – Overview

Bill 28: Municipal Affairs and Housing Statutes Amendment Act, 2026 was introduced to the Legislative Assembly on April 2, 2026. The Bill proposes amendments to the *Municipal Government Act (MGA)*, the *Alberta Housing Act*, the *Libraries Act*, and the *Municipal Affairs Statutes Amendment Act, 2025*.

Bill 28 introduces a wide range of amendments across five major areas of municipal responsibility:

- ◆ **Enabling Growth and Housing:** New provincial requirements intended to support housing development and streamline planning processes
- ◆ **Aggregate Pits:** Limits municipal ability to regulate development of aggregate pits
- ◆ **Seniors Housing:** Broadens reserve requirements and requisitioning scope related to seniors and social housing, and increases power of Minister to determine reserve levels and requisition responsibilities.
- ◆ **Assessment and Property Tax:** Adjustments to regulated assessment, taxation authority, and growth-related cost recovery
- ◆ **Governance and Accountability:** Creation of a new provincial councillor accountability framework and updates to municipal governance processes
- ◆ **Municipal Transparency:** Expanded reporting, disclosure, and information-sharing requirements
- ◆ **Public Institutions:** New provincial oversight mechanisms for public libraries and authority to direct the governance of municipal utilities

Overall, the Bill reflects a shift toward greater provincial involvement in several areas traditionally managed at the local level. While some amendments introduce tools or clarify existing processes, others establish new provincial authorities or standardize municipal practices in ways that may influence how municipalities plan, govern, and deliver services. Some of the changes may be intended, or at least appear positioned, to increase consistency across municipalities, though they may also affect the flexibility municipalities have to set local priorities, make community-specific decisions, and oversee development in a manner that reflects local goals and circumstances – which can differ significantly from community to community.

Several elements of Bill 28 introduce new governance provisions and administrative or requirements, and in many cases the full impact will depend on future regulations. As these regulations are developed, it will be important that the intent behind the changes is clearly defined, that municipalities have the capacity and tools needed to implement them effectively, and that local decision-making remains appropriately supported. Rural municipalities play a critical role in delivering services and maintaining infrastructure, and ensuring that provincial and local approaches remain aligned will be essential to achieving the outcomes envisioned in the legislation.

It is also important to note that many of the changes related to planning and development were the subject of provincial engagements with industry and municipalities in recent years. Many of the engagements, and the specific municipal powers that have since been modified in Bill 28, were discussed through a lens of “red tape reduction” for industry. Despite a lack of data or evidence as to why municipal planning powers posed unreasonable financial or time impacts on industry, and a lack of discussion as to why such powers were required to support proper local planning and development, many of the changes appear to be moving forward. RMA is concerned that many of the changes will have the effect of reducing municipal influence into local planning and development without transferring accountability for such decisions to the provincial level.

How to Use this Document

This document provides RMA members with a focused overview and analysis of the most significant amendments introduced through Bill 28. It does not include every legislative change. Members seeking clarification or analysis of amendments not covered here are encouraged to contact RMA's Policy and Advocacy Department.

Each amendment summarized in this document includes:

- ◆ **Summary:** A concise explanation of the change and its understood or apparent purpose based on the legislative language.
- ◆ **Previous Status:** The relevant provision as it existed prior to Bill 28, using legislative wording where appropriate or a concise summary.
- ◆ **Amended Status:** The change introduced by Bill 28, presented using the Bill's wording or a concise summary.
- ◆ **Analysis:** RMA's interpretation of how the change may be implemented, including potential considerations, risks, implications, and potential impacts on members.

As noted, in some cases, the "previous" and "amended" descriptions use the exact wording from the relevant Act or from Bill 28. Where the legislative language is lengthy or requires cross-referencing other sections, a clear summary is provided instead.

The analysis reflects RMA's understanding of how each amendment may affect municipal operations, governance, or finances. Where impacts are uncertain or expected to be minimal, the section serves primarily as a descriptive explanation. Where changes are likely to have meaningful implications – or relate to existing RMA positions – the analysis highlights potential risks, opportunities, and considerations for members.

Overview of Key Legislative Changes

Enabling Growth and Housing

“Automatic Yes” and Automated Systems, S. 640(2)

Summary	Previous Status	Amended Status	Analysis
<p>These amendments introduce new provisions allowing municipalities to use automated systems for processing and issuing development permits, while also granting the Minister authority to require municipalities to adopt such systems. This establishes a legislative basis for an “automatic yes” framework in which applications meeting predetermined criteria must be approved without discretionary review.</p>	<p>No previous provision.</p>	<p>s. 640(2) A land use bylaw (c.1) may authorize the use of an automated system for making decisions on applications for development permits and issuing development permits, if applicable;</p> <p>(2.1) Notwithstanding subsection (2)(c.1), the Minister may, by regulation, require a municipality to use an automated system referred to in clause (c.1).</p> <p>(2.2) A regulation under subsection (2.1) may apply either generally or specifically.</p>	<p>Section 640(2) establishes the rules municipalities must follow when creating land use bylaws, including the processes used to review and decide development permit applications. Prior to Bill 28, permit decisions were made by municipal development authorities, and the MGA did not contemplate automated approvals. The addition of s. 640(2)(c.1) allows municipalities to adopt automated systems capable of issuing development permits, but the more consequential change is the Minister’s new regulation-making authority under s. 640(2.1) and (2.2) to require individual, several or all municipalities to use such systems.</p> <p>These amendments represent a significant shift in decision-making authority, enabling the province to mandate automated approvals and reduce municipal discretion. While automation may streamline processes, it may also limit municipalities’ ability to consider local context, cumulative impacts, or site-specific issues, and may create operational challenges for rural municipalities with limited technological capacity. It is crucial that this remain an enabling provision for municipalities and not be mandated through a regulation.</p>

Regulation-Making Authority Pertaining to Automated Systems, S. 694

Summary	Previous Status	Amended Status	Analysis
<p>These amendments expand the Minister’s regulation-making authority under s. 694 to include the ability to prescribe processes, timelines, information requirements, and rules governing automated development permit systems.</p> <p>The amendments also allow the Minister to modify statutory requirements in Part 17 through regulation.</p>	<p>No previous provision.</p>	<p>s. 694(1) The Minister may make regulations</p> <p>(a) respecting the use of an automated system for the purposes of section 640, including</p> <p>(i) making decisions on applications for development permits, and</p> <p>(ii) issuing development permits;</p> <p>(a.01) prescribing processes, timelines or other requirements for the purposes of issuing a development permit under section 642(1) or a notice under section 642(4);</p> <p>(a.02) respecting applications for the subdivision and development of land;</p> <p>(h.3) respecting the documents and information that a development authority may require as part of an application under section 683.1;</p> <p>(2.1) Regulations under subsection (1)(a.01) may modify the requirements in this Part to any extent the Minister considers necessary or appropriate to give effect to the regulations.</p>	<p>Section 694 establishes the Minister’s regulation-making authority under the MGA. The amendments to this section significantly expand this authority by enabling the Minister to regulate several core components of municipal planning and development processes. New powers include the ability to establish rules for the use of automated systems in development-permit decision-making under s. 640, prescribe processes and timelines for issuing development permits and notices under s. 642, and create requirements related to subdivision and development applications more broadly.</p> <p>The amendments also authorize the Minister to determine what information a development authority may require when assessing application completeness under s. 683.1. In addition, s. 694(2.1) allows regulations made under s. 694(1)(a.01) to modify statutory requirements in Part 17 (Planning and Development) to any extent the Minister considers necessary.</p> <p>Collectively, these changes provide the Minister with broad discretion to reshape municipal development-approval processes, override existing legislative requirements, and impose province-wide or targeted procedural standards on municipalities. While these tools may be used to streamline approvals and increase consistency, they also reduce flexibility and may limit the ability of rural municipalities to tailor planning and development processes to local capacity and context, and to seek information from applicants necessary to make a proper decision on a development application.</p>

Community Design Codes, S. 640.3

Summary	Previous Status	Amended Status	Analysis
<p>These amendments establish Ministerial authority to create “community design codes” by regulation. These codes may set detailed design and development standards for residential and commercial subdivision, development, and redevelopment.</p>	<p>No previous provision. The MGA did not authorize provincial design codes or provide a mechanism for the Minister to impose detailed design standards on municipalities.</p>	<p>s 640.3(1) Defines a community design code</p> <p>s 640.3(2) Authorizes the Minister to establish one or more community design codes by regulation for residential and commercial subdivision, development, and redevelopment.</p> <p>s. 640.3(3) A design code may:</p> <ul style="list-style-type: none"> • set rules for architectural styles, districting, frontage standards and heights, historical architectural styles, landscaping, parks and open spaces, and parking and street design; • establish adoption procedures; • set alternative approval criteria or timelines. <p>s. 640.3(4) Unless otherwise stated, a design code:</p> <ul style="list-style-type: none"> • prevails over statutory plans, land-use bylaws, and other Part 17 regulations; • is binding on subdivision and development authorities, appeal boards, and the LPRT. <p>s.640.3(5) A municipality may adopt a design code by bylaw.</p> <p>s. 640.3(6) The Minister may require a municipality to adopt a design code for all or part of the municipality.</p>	<p>This section introduces a new provincial mechanism that could alter how municipalities regulate subdivision and development, how municipalities and developers collaborate to design new development, and how redevelopment occurs in mature neighbourhoods. By enabling the Minister to establish design codes that supersede municipal plans and bylaws, the amendment shifts authority over planning and design decisions to the province if the Minister enacts a design code regulation.</p> <p>Design codes create the potential for provincially prescribed standards that may not reflect local context, servicing realities, or community priorities. This raises practical concerns about how municipalities will reconcile provincially imposed design requirements with existing land-use plans, redevelopment strategies, or infrastructure constraints.</p> <p>Design codes also add a new regulatory requirement that could affect development feasibility, particularly in capacity-constrained municipalities that may struggle to implement or administer design standards. Without clarity on how codes will be tailored to diverse municipal conditions, the amendment creates uncertainty around future planning autonomy and the degree to which local decision-making will remain respected.</p> <p>It is also important to note that codes may apply to both development of private property (frontage standards, architectural styles, etc.) and public infrastructure (street design, parks, etc.). This further complicates the roles of the province, municipalities, and private developers.</p>

Expansion of Off-Site Levy Exemptions to Charter and Independent Schools, S. 648(1.2)

Summary	Previous Status	Amended Status	Analysis
<p>This amendment broadens the existing exemption from off-site levies for school-related development. The exemption, previously limited to school boards, now applies to charter schools and accredited independent schools, whether they own or lease the land. This standardizes levy treatment across school-authority types and removes municipal authority to recover off-site infrastructure costs for new school sites.</p>	<p>s. 648(1.2) A bylaw may not impose an off-site levy on land required for a school building project that is</p> <p>(a) owned by a school board, or</p> <p>(b) leased to a school board in accordance with section 187.1(4)(b) of the Education Act.</p>	<p>s. 648(1.2) A bylaw may not impose an off-site levy on land required for a</p> <p>(a) school building project that is owned by a school board or charter school,</p> <p>(b) school building project that is leased to</p> <p>(i) a school board in accordance with section 187.1(4)(b) of the Education Act, or</p> <p>(ii) a charter school,</p> <p>(c) development for a school building on land that is owned by an accredited independent school, or</p> <p>(d) development for a school building on land that is leased by an accredited independent school.</p>	<p>Section 648(1.2) restricts the ability of municipalities to impose off-site levies on lands used for school building projects. Prior to this amendment, the exemption applied only to land owned by a school board or leased to a school board under the Crown-ownership and leaseback model established in s. 187.1(4)(b) of the <i>Education Act</i>, which ensures school authorities retain a defined legal interest in new school sites even when title is held by the Crown.</p> <p>The amendment broadens the exemption to include charter schools and accredited independent schools, whether they own or lease the land. As a result, municipalities are prohibited from imposing off-site levies on any land used for constructing a school building across all major school-authority types.</p> <p>The expanded exemption means municipalities cannot apply off-site levies to any school-related development, regardless of ownership or lease structure, limiting the tools available to fund infrastructure required to accommodate new school sites.</p>

Off-Site Levy Restrictions, S. 648(2.11)

Summary	Previous Status	Amended Status	Analysis
<p>These amendments clarify which costs off-site levies cannot fund. While the MGA previously identified eligible levy uses, it did not specify excluded categories. The new provisions explicitly prohibit using levy revenues for operational expenses, non-essential commercial components, movable items, and capital upgrades that exceed required building-code standards.</p>	<p>No previous provision. The MGA listed eligible off-site levy categories but did not identify specific costs that were excluded off-site levies.</p>	<p>s. 648(2.11) An off-site levy may not be used to pay for the following:</p> <ul style="list-style-type: none"> (a) operational costs; (b) capital costs relating to commercial retail facilities included in the design of a facility referred to in subsection (2) or (2.1) that are not required to deliver the facility’s core services; (c) anything not permanently affixed to a facility referred to in subsection (2) or (2.1); (d) capital costs referred to in subsection (2) or (2.1) incurred to build to a standard higher than the standard required under any applicable building codes. 	<p>Section 648(2.11) restricts the types of costs that can be funded through off-site levies, excluding operational expenses, non-essential commercial elements within public facilities, movable items, and infrastructure built to a higher standard than required by code. While intended to tighten levy eligibility, these restrictions may limit municipal discretion in project design, reduce the ability to incorporate community-desired features, and create challenges for municipalities seeking to deliver infrastructure that reflects local needs or long-term planning objectives.</p>

Charter School Access to Reserve Land, S. 671

Summary	Previous Status	Amended Status	Analysis
<p>Charter schools are tuition-free, autonomous public schools operated by a non-profit society rather than an elected school board, usually offering specialized or enhanced programming.</p> <p>This amendment will allow charter schools to have access to reserve and municipal land in developing communities in the same way that public, separate (Catholic), and Francophone school boards do.</p>	<p>s. 671(2) Municipal reserve, school reserve or municipal and school reserve may be used by a municipality or school board or by them jointly only for any or all of the following purposes:</p> <p>(a) a public park;</p> <p>(b) a public recreation area;</p> <p>(c) school board purposes;</p> <p>(d) to separate areas of land that are used for different purposes.</p>	<p>Section 671 is amended by adding the following after subsection (2):</p> <p>s. 671(2.01) A charter school may use municipal reserve, school reserve or municipal and school reserve for the operation of the charter school.</p>	<p>This amendment, which allows charter schools to use municipal, school, and municipal/school reserve land introduces opportunities and challenges. Rural municipalities often have limited reserve parcels, many of which are already planned to be used for parks, community facilities, or future school sites for other school boards. Adding charter schools as eligible users increases competition for this land and may complicate long-term planning, especially since charter schools operate outside of the traditional communication and planning channels that exist between the Government of Alberta, municipalities and local school boards.</p> <p>Charter schools bring diverse educational opportunities to rural families and the benefits of this should not be ignored. However, this change will require rural municipalities to think carefully about how they allocate reserve land, how they manage infrastructure obligations, and how they balance community needs with the interests of charter school providers.</p>

Development Permit Statistics, S. 683.2

Summary	Previous Status	Amended Status	Analysis
<p>Beginning in 2027, municipalities with populations over 15,000 must annually publish detailed development permit statistics, including application volumes, processing timelines, and comparisons to statutory requirements.</p>	<p>No previous provision.</p>	<p>s. 683.2 Commencing in 2027, on or before March 31 of each year, each municipality with a population of more than 15 000 people must publish the following on the municipality’s website in respect of the previous calendar year:</p> <p>(a) the total number of applications for development permits that were received;</p> <p>(b) the total number of development permits issued;</p> <p>(c) the average and median number of days from when an application for a development permit was received to when the application is determined, deemed or acknowledged to be complete under section 683.1(1), (4) or (7), as the case may be, or deemed to be refused under section 683.1(8);</p> <p>(d) the average and median number of days from when an application was determined, deemed or acknowledged to be complete under section 683.1(1), (4) or (7), as the case may be, to when a development permit is issued under section 642(1) or (2) or refused under section 642(2) or 684(3), as the case may be;</p> <p>(e) a comparison between the averages in clauses (c) and (d) to required timelines in sections 683.1(1) and 684(1).</p>	<p>This amendment introduces a new annual reporting requirement for municipalities with a population over 15,000, mandating the publication of detailed development permit statistics and processing timelines. While the information may support transparency and provide the public with clearer insight into how municipal performance aligns with statutory timelines, it also represents an additional administrative obligation.</p> <p>Producing and publishing the mandated statistics may require new tracking systems, staff time, and administrative processes. This adds to municipal workload without clear evidence that the reporting itself will improve development outcomes or meaningfully support housing supply.</p> <p>Alberta’s municipalities already lead the country in housing growth, and provincial requirements should support rather than constrain the local planning processes that enable this success. New reporting obligations may increase administrative burden and costs, particularly if not accompanied by provincial support or flexibility. It may also result in a focus on approval speeds at the cost of proper review of applications, introducing both planning and safety risks. Ensuring that these requirements are implemented in a way that is practical, proportionate, and aligned with municipal capacity will be important to avoid unintended impacts on local development processes.</p>

Restrictions on Non-Statutory Planning Studies, No MGA Section (Future Regulation)

Summary	Previous Status	Amended Status	Analysis
<p>While Bill 28 does not include legislation restricting the use of non-statutory plan requirements, the Government of Alberta has informed RMA and other municipal stakeholders of an intention to develop a future regulation addressing the use of non-statutory studies in the development approval process.</p>	<p>No legislative provisions addressed non-statutory studies, and municipalities retain discretion to require supporting studies as part of development and subdivision applications.</p>	<p>Bill 28 does not amend the MGA with respect to non-statutory studies. The only change is a stated intention to develop a future regulation.</p> <p>S. 694(1)(f.1), which already exists in the MGA, allows the Minister to make regulations respecting the types of studies that a development authority is able to require.</p>	<p>Municipal Affairs' Bill 28 Information Guide indicates that future regulatory work will build on related Bill 28 amendments intended to “reduce unnecessary costs and delays” and will examine the role of non-statutory studies to “further streamline approvals.”</p> <p>It is unclear how the province intends to determine which studies are considered unnecessary, or how limits on study requirements would account for local conditions. Municipalities rely on non-statutory studies to ensure development is safe, appropriately serviced, and compatible with surrounding land uses. Restricting these tools could reduce municipal ability to manage growth responsibly, address site-specific risks, or require information needed to make informed planning decisions. While it is possible some non-statutory studies are requested unnecessarily by one or a small number of municipalities, prohibiting or restricting their use on a provincewide basis could introduce significant local risks.</p> <p>Further detail will be needed to understand the scope of any proposed restrictions and their implications for municipalities. RMA plans to advocate for the Government of Alberta to not move forward on this change and maintain local autonomy to gather information required to make informed development decisions. Continued engagement with Municipal Affairs will be important as the regulatory framework is developed.</p>

Enabling Growth and Housing: RMA Analysis

Initial Reaction

The amendments within this theme signal a substantial shift toward increased provincial oversight of municipal planning, development approvals, and growth-related infrastructure decisions, many of which reflect lobbying efforts from the development industry. While framed as a measure to support development, accelerate housing supply, and streamline processes, many of the changes introduce new provincial mechanisms that can override or constrain local planning processes and impose uniform standards across diverse municipal contexts.

At the same time, municipalities are expected to meet new administrative and reporting obligations while losing flexibility in how they manage growth and fund supporting infrastructure. Expanded off-site levy exemptions and restrictions, and potential limits on non-statutory studies reduce the tools municipalities rely on to ensure development is safe, financially sustainable, and aligned with long-term plans.

Taken together, these amendments prioritize speed and provincial control over local expertise, community context, and long-term planning considerations. They also create a risk that municipalities will be held accountable for costs, delays, or infrastructure pressures they can no longer fully control – effectively downloading new responsibilities without committed funding or support. The result is a more centralized system that will likely create challenges for municipalities already working efficiently to support responsible development.

Autonomy Impact

The Minister's authority to require automated permit systems, prescribe approval processes, and establish community design codes that override statutory plans and land-use bylaws represents a significant rebalancing of planning power from municipalities to the province. Expanded regulation-making authority under s. 694 allows the Minister to set or modify core components of development-approval processes, including timelines, information requirements, and even statutory provisions in Part 17 (Planning and Development).

Financial autonomy is also reduced. Off-site levy exemptions for charter and independent schools limit municipal ability to recover infrastructure costs associated with growth, while new restrictions on levy-eligible expenses narrow the scope of what municipalities can fund. Granting charter schools access to reserve land introduces additional competition for community-serving land assets, complicating long-term planning.

Mandatory reporting requirements and potential future limits on non-statutory studies further constrain how municipalities manage their planning processes and assess development impacts. Collectively, these changes reduce municipal discretion in both planning and financial decision-making, increasing provincial oversight and limiting the ability to tailor growth management to local conditions.

Rural Impact

While most of the changes in this section appear intended to address residential development in urban communities, rural municipalities are likely to feel these changes more acutely due to limited administrative capacity, higher per-capita infrastructure and servicing costs, and fewer technological resources. Requirements such as automated approval systems and expanded reporting may be difficult to implement in some rural communities, and could ultimately increase costs and red tape for municipalities that process a small amount of permits. Provincially imposed design standards may not reflect local development patterns, servicing realities, or rural property owner preferences. These pressures are amplified by rural geographic realities, where long distances, limited serviced land, and aging infrastructure mean that even modest growth can create significant operational demands.

Overall, the cumulative effect is a greater administrative and financial burden on rural municipalities, combined with reduced flexibility to manage growth and support responsible development in ways that reflect local conditions.

Aggregate Pits

Pit Applications Under the EPEA, S. 619.1(1)-(2)

Summary	Previous Status	Amended Status	Analysis
<p>This amendment specifies the connection between the <i>Environmental Protection and Enhancement Act</i> (EPEA) and the <i>Municipal Government Act</i> (MGA) is administered by the Director (as defined in the EPEA) and their authority under the EPEA</p>	<p>No previous provision.</p>	<p>619.1(1) In this section, (a) “Director” means a Director as defined in the <i>Environmental Protection and Enhancement Act</i>; (b) “registration” means a registration issued by a Director under section 68 of the <i>Environmental Protection and Enhancement Act</i>.</p>	<p>Section 619.1(1) confirms the connection between the <i>Environmental Protection and Enhancement Act</i> (EPEA) and MGA and provides some clarity around roles and responsibilities. However, RMA is concerned that this provides the Director and Alberta Environment and Protected Areas with a level of authority that appears to exceed that of other agencies listed in section 619. The NRCB, ERCB, AER, AEUB and AUC are now required, to varying degrees, to consider municipal statutory plans in their decision making. There is no similar requirement under section 68. Rather, “the Director may issue approval subject to any terms and conditions the Director considers appropriate”.</p>
<p>This amendment introduces the concept of provincial prevalence over pit developments and permits, overriding municipal statutory plans, land use bylaws, subdivision decisions, development permits, appeals or LPRT decisions.</p>	<p>No previous provision.</p>	<p>619.1(2) A registration in respect of a pit prevails, in accordance with this section, over any statutory plan, land use bylaw, subdivision decision or development decision by a subdivision authority, development authority, subdivision and development appeal board, or the Land and Property Rights Tribunal or any other authorization under this Part.</p>	<p>Section 619.1(2) establishes a provincial level primacy for pit registrations issued under section 68 of the EPEA. This would ensure that EPEA registrations override any municipal statutory plans, land-use bylaws, subdivision decisions, development permits, or Tribunal decisions.</p> <p>This shifts decision making authority to the province and infringes on municipal jurisdiction. It limits the ability to ensure that local factors, risks and impacts associated with improper pit developments or operating practices are mitigated. Without a requirement on the Director to give due consideration to municipal planning documents, this risks longer term unintended consequences for land use and management. It undermines the municipality’s ability to balance economic growth, infrastructure needs, environmental constraints, and community expectations.</p> <p>The amendment also goes beyond recommendations or areas noted for further discussion from the Sand and Gravel Task Force.</p>

Pit Applications Under the EPEA, S. 619.1(3)

Summary	Previous Status	Amended Status	Analysis
<p>This amendment requires the municipality to approve the pit application and amend their statutory plans and bylaws to accommodate the development.</p>	<p>No previous provision.</p>	<p>619.1(3) When a municipality receives an application for a statutory plan amendment, land use bylaw amendment, subdivision approval, development permit or other authorization under this Part and the application is consistent with a registration in respect of a pit, the municipality must approve the application to the extent that it complies with the registration.</p>	<p>Section 619.1(3) requires a municipality to approve pit applications and amend their planning documents to align with the registration. Municipalities cannot amend the plan or matters that have been approved by the Director. This amendment effectively requires the municipality to amend their planning and zoning framework to prioritize aggregate development. This may have effects for local infrastructure such as roadways. It also undermines long-term planning undertaken by the municipality. RMA does not support provisions that reduce municipal autonomy.</p> <p>Overriding municipal statutory planning instruments may lead to greater land use conflict in the long term. It limits the ability of rural municipalities to tailor planning and development processes to local factors. The amendment may provide greater short-term certainty for industry, but it increases uncertainty for municipalities and residents particularly in the absence of any long-term planning.</p> <p>It may also place the Council in direct conflict with residents who may not support prioritization of aggregate development over other land uses.</p> <p>It is unclear how matters not covered under the EPEA, Water Act or Conservation and Reclamation Regulation will be addressed (e.g., whether other matters remain within a municipality's jurisdiction) and whether or how those matters should be assessed for consistency or compliance with a registration.</p>

Pit Applications Under the EPEA, S. 619.1(4)

Summary	Previous Status	Amended Status	Analysis
<p>Municipalities must decide on statutory plan or land use bylaw amendments within 90 days unless a longer timeline is agreed to, and they are no longer required to hold a public hearing when the amendment is triggered by a pit registration issued by the Director.</p>	<p>No previous provision.</p>	<p>619.1(4) An approval of a statutory plan amendment or land use bylaw amendment under subsection (3)</p> <p>(a) must be granted within 90 days after receipt of the application or a longer time agreed on by the applicant and the municipality, and</p> <p>(b) is not subject to the requirements of section 692 unless, in the opinion of the municipality, the application relates to matters not included in the registration.</p>	<p>Section 619.1(4) introduces a 90-day timeframe for approval and integration of amendments. The 90-day timeframe does not appear to be based on historical application processing data or other evidence. While aggregate pits have typically been classified as “low risk” development by EPA, there is no clear provision for more complex applications or higher risk developments, particularly if a longer time cannot be agreed upon.</p> <p>Section 692 requires council to hold a public hearing on a proposed bylaw or amendment. As section 619.1(4)(b) would no longer require municipalities to hold a public hearing, broader public input, intervenor participation and public accountability is removed. This poses a risk to the municipality, particularly if the community is not aware of the shift in provincial regulatory oversight. This risk is further increased due to the lack of clarity as to whether the provincial approval process will be broadened to allow for greater municipal or public input.</p> <p>The municipality can hold a public hearing if it is of the opinion that the application relates to matters not included in the registration. However, it is not clear what those matters can include. It is also not clear whether the outcome of the hearing and any public input can be properly accounted for by the municipality if the registration prevails over any municipal statutory plan, land use bylaw or development decision. In other words, a hearing is unlikely to change the outcome.</p>

Pit Applications Under the EPEA, S. 619.1(5)-(6)

Summary	Previous Status	Amended Status	Analysis
<p>This amendment allows municipalities to include conditions in the subdivision approval or development permit as long as they have been previously set out in their decision-making frameworks and do not conflict with the pit registration.</p>	<p>No previous provision.</p>	<p>619.1(5) A subdivision approval or development permit under subsection (3) may include one or more conditions permitted under section 640(2)(c)(iv) or 655 if the condition does not conflict with the registration.</p>	<p>Section 619.1(5) retains some municipal planning authority and provides for the inclusion of conditions in a subdivision approval or development permit that do not conflict with the registration. Clarity is needed regarding what conditions are regulated under provincial legislation and which remain under municipal authority. For example, dust is regulated at both the provincial and municipal level but for different purposes.</p> <p>Section 640(2)(c)(iv) requires that a municipality’s land use bylaw establish a decision-making framework for development permit applications, including the conditions that may be attached to a permit. This provision ensures that the bylaw sets out both the general and permit-specific conditions a development authority may impose, providing a clear statutory basis for conditioning approvals and regulating how development permits are issued. It will be important that the decision-making framework is not overridden or modified by the registration.</p> <p>Section 655 sets out conditions of subdivision approvals.</p>
<p>This amendment specifies if the municipality holds a public hearing, the hearing cannot engage on matters already decided on by the Director under the EPEA.</p>	<p>No previous provision.</p>	<p>619.1(6) If a municipality that is considering an application under subsection (3) holds a hearing, the hearing may not address matters already decided by a Director in the registration, except as necessary to determine whether an amendment to a statutory plan or land use bylaw is required.</p>	<p>Section 619.1(6) states that if a municipality holds a hearing, the hearing can only be held to determine whether an amendment to a statutory plan or land use bylaw is required. Any matters decided by a Director in the registration cannot be discussed or modified.</p> <p>However, section 619.1(4)(b) states that a municipality can hold a public hearing if it is of the opinion that the application contains matters not included in the registration. Further clarity is required.</p>

Pit Applications Under the EPEA, S. 488 (1) and 619.1(7)-(12)

Summary	Previous Status	Amended Status	Analysis
<p>These amendments introduce the process by which the LPRT can hear appeals related to aggregate registrations and municipal approvals. There are numerous changes that formalize give the LPRT expanded powers to make decisions in cases of dispute between municipalities and aggregate proponents with a registration.</p>	<p>No previous provisions.</p>	<p>MGA S. 488(1) and S. 619.1(7) – (12):</p> <ul style="list-style-type: none"> • give the LPRT authority to hear cases where municipal statutory plans are not amended to enable an EPA registration • define the appeal application process • establish hearing timelines • establish that the scope of a hearing is limited to whether or not a statutory plan conflicts with a registration • give the LPRT authority to order a municipality to revise a statutory plan • includes clarity that an LPRT decision may be appealed to the Alberta Court of Appeals 	<p>These amendments give the LPRT authority to hear and make decisions in the case where an aggregate proponent with an EPA registration may appeal a municipal decision in the case that municipal statutory plans conflict with the EPA registration or municipal approvals have not met the set timelines. Additionally, the amendments do not specify under S. 494 that the chair of the LPRT must notify any assessed person of a hearing related to aggregate pits, limiting local input.</p> <p>RMA previously published a report regarding the LPRT that highlights concerns with some of their processes. Introducing aggregate approval appeals to the LPRT may necessitate further review to ensure procedural fairness.</p>

Aggregate Pits: RMA Analysis

Initial Reaction

The amendments creates a binding process that ensures municipal planning instruments cannot contradict or impede provincially approved pit registrations. Pit registrations under the *Environmental Protection and Enhancement Act* (EPEA) override any conflicting municipal statutory plans, land-use bylaws, subdivision decisions, development permits, or LPRT decisions. The proposed amendments do not require the Director to consider municipal statutory plans in their decision-making process. As a result, the Director/EPA has more discretion under section 619.1 compared to the quasi-judicial agencies under section 619, as entities such as the NRCB and AUC have some level of consideration for municipal plans within their approval processes; the EPEA does not.

RMA does not support provisions that increase provincial overreach and limit municipal autonomy. Rural municipalities require the ability to make decisions that reflect local priorities without provincial interference or external pressures. While a municipality retains some oversight on conditions that may be attached to a development permit or subdivision approval, these conditions cannot conflict with a provincially approved registration. Further clarity is required on the differentiation of responsibilities between the province and municipalities, particularly regarding development impacts that may fall outside previous provincial legislative and regulatory requirements, or that fell under both provincial and municipal jurisdiction but for different purposes.

Autonomy Impact

Municipalities will be required to approve a pit application to the extent that it aligns with the provincial registration under the EPEA with limited ability to include local conditions or hold public hearings. Municipal approvals must meet prescribed timeframes.

These changes raise concerns about continued erosion of municipal land use authority, reduced local decision-making, and restricted opportunities for community input. The amendment effectively requires the municipality to amend their planning and zoning framework to prioritize aggregate development. It undermines long-term planning undertaken by the municipality and may lead to greater land use conflict in the future, increasing uncertainty for municipalities, residents and other prospective developers. The amendment does not go as far as reserving land in advance of aggregate pit developments, but establishing provincial level primacy in pit developments sets a precedence for further intrusion into local land use decisions.

Rural Impact

Aggregate extraction occurs primarily within rural municipalities, and has a history of creating land use conflicts in some municipalities. Limited ability to hold public hearings or to engage on any matters already decided on by the Director restricts input from those directly affected by the pit operation, such as neighbouring rural businesses, farms, and residential developments. Shifting greater authority to the province can impact rural municipalities' long-term planning for economic growth, housing and infrastructure.

Seniors Lodges

New Definitions Related to Seniors Lodges, S. 1 (*Alberta Housing Act*)

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 introduces the ability for the Minister to define an “operating reserve fund by regulation. This amendment enables subsequent changes in the Act that allow housing management bodies to requisition municipalities for operating reserve funds for lodge (seniors) accommodation. It is unclear whether a regulation will be developed to define what the fund includes or how it can be used.</p>	<p>No previous provision.</p>	<p>1(h.1) “operating reserve fund” means an operating reserve fund as defined in the regulations;</p>	<p>Bill 28 introduces important housing terminology to the <i>Alberta Housing Act</i> (AHA) but leaves the definition to potential forthcoming regulation, giving the Minister broad discretion over how these terms are interpreted. Operating reserve funds are currently utilized for seniors’ housing, however, this has occurred without any legislative or regulatory parameters. The content and permitted uses of the newly defined operating reserve fund for lodge (seniors) accommodations are left entirely to regulation, meaning that the practical rules will be set later and can be changed without returning to the legislature. This leaves municipalities and housing management bodies uncertain about how the fund may actually function.</p>
<p>Amendments through Bill 28 allow for the Minister to define “social housing accommodation” through regulation.</p>	<p>No previous provision.</p>	<p>1(h.2) “social housing accommodation” means a social housing accommodation as defined in the regulations.</p>	<p>Bill 28 allows for the Minister to define “social housing accommodation” through regulation. “Social Housing Accommodation” is not currently defined in the AHA, however, it is used in the Act as a housing type separate from “affordable housing accommodation”, which the Minister has authority to designate. Currently, the Minister cannot designate social housing accommodation as affordable housing accommodation. It is unclear how the newly introduced definition powers may change this relationship and what the practical impacts will be.</p>

Requisition Scope, S. 7 (Alberta Housing Act)

Summary	Previous Status	Amended Status	Analysis
<p>This amendment limits the scope of lodge accommodation management bodies to request municipal contributions for reserve funds. As discussed below, s. 34(1)(c)(iii.1) gives the Minister authority to regulate reserve funds. As such, it appears that s. 7(1) is amended to remove the ability of a housing body to create new types of reserve funds that they can requisition municipalities for. Going forward, these bodies may only request amounts necessary to cover their annual operating deficit under this provision.</p> <p>Allocations to reserve funds will now operate under the newly added s. 7.1 (Requisitions – capital maintenance reserve fund, capital reserve funds and operating reserve fund for lodge accommodations) described below.</p>	<p>7(1) On or before April 30 in any year a management body that provides lodge accommodation may requisition those municipalities for which the management body provides lodge accommodation for</p> <p>(a) the amount of the management body’s annual deficit for the previous fiscal year arising from the provision of lodge accommodation, and</p> <p>(b) any amounts necessary to establish or continue a reserve fund for the management body.</p>	<p>7(1) Each year, on or before April 30, a management body that provides lodge accommodation may requisition those municipalities for which the management body provides lodge accommodation for the amount of the management body’s annual deficit for the previous fiscal year arising from the provision of lodge accommodation.</p>	<p>This amendment shifts the legislative authority for an HMB to requisition municipalities for a reserve fund to a new sub-section (7.1(1)). The details of the new sub-section are covered below, however, it appears that the result of the change is that there are additional parameters on what types of reserve funds an HMB can requisition a municipality for.</p> <p>Additionally, s. 34(1)(c)(iii.1) gives the Minister regulation making authority related to the types of reserve funds a housing body can requisition a municipality for. Correspondingly, s. 7(1) removes the ability of a housing body to requisition a municipality for new reserve funds. This change may improve clarity on what an HMB can requisition for.</p>

HMB Requisitioning Authority, S. 7.1 (Alberta Housing Act)

Summary	Previous Status	Amended Status	Analysis
<p>The introduction of section 7.1 (Requisitions – capital maintenance reserve fund, capital reserve funds, and operating reserve fund for lodge accommodations) allows an HMB to requisition its member municipalities each year for the amount needed to meet the Minister-required minimum in the capital maintenance reserve fund, and with municipal approval, additional amounts for capital, operating, or extra capital maintenance reserves. The Minister may also require other municipalities that were previously uninvolved to contribute to these funds.</p> <p>Once a municipality receives written notice of their requisition, they must pay within the timeframe set by the Minister. Any unpaid amount will be subject to interest and will become a debt owed to the HMB by the municipality.</p>	<p>No previous provision.</p>	<p>Section 7.1(1) outlines that an HMB that operates lodge accommodations can requisition the municipalities it serves annually, by April 1, for:</p> <ul style="list-style-type: none"> • Required capital maintenance funds (the amount the Minister determines must be in the capital maintenance reserve). • Additional reserve funds (ie. capital reserve funds, operating reserve funds, and extra capital maintenance funds beyond the required minimum) if the municipalities agree. <p>Municipalities will still decide how to split costs. If they cannot agree, the cost is shared based on each municipality's share of total equalized assessment.</p> <p>The Minister can also order municipalities not originally requisitioned by the HMB to contribute.</p> <p>Once a Municipality receives written notice of the requisition, they must pay within the timeframe set by the Minister. Interest will apply if the timeframe is not adhered to, at a rate also set by the Minister. The unpaid amount plus interest will become a debt owed to the HMB by the municipality.</p>	<p>The new requisition framework significantly reshapes the financial relationship between municipalities, HMBs, and the Government of Alberta. HMBs must now meet provincially determined minimum reserve levels, which could increase annual requisition amounts. This introduces an uncertain financial obligation for municipal budgeting and may force municipalities to make difficult financial decisions related to service delivery or increasing property taxes.</p> <p>This shift also changes how municipalities may participate in long-term planning for seniors housing. Because management bodies can request additional reserve contributions only with municipal approval, municipalities retain some influence, but the baseline obligations are set by the Minister. This means that municipalities may have less ability to shape capital planning priorities or negotiate contributions based on local circumstances.</p> <p>The Minister's authority to add new contributing municipalities introduces another layer of uncertainty. A municipality that has not historically funded a lodge could suddenly be required to contribute, potentially without a role in governance or planning. This could strain intermunicipal relationships and further complicate budgeting processes.</p>

Regulation-Making Authority Related to Reserves, S. 34 (*Alberta Housing Act*)

Summary	Previous Status	Amended Status	Analysis
<p>S. 34 outlines the Minister’s regulation-making authority within the affordable housing framework. These amendments update the authority to reflect the new reserve fund structure, allowing the Minister to regulate capital maintenance reserve funds, capital reserve funds, and operating reserve funds for lodges, social housing, and other accommodations.</p>	<p>34(1)(c)(iii.1) respecting reserve funds for management bodies that provide lodge accommodation;</p>	<p>s. 34(1)(c)(iii.1) respecting capital maintenance reserve funds, capital reserve funds and operating reserve funds for management bodies that provide:</p> <p>(A) lodge accommodation, or</p> <p>(B) social housing accommodation other than lodge accommodation,</p>	<p>This amendment expands the Minister’s authority to regulate all types of housing reserve funds, which have indirect but potentially significant impacts on municipalities. By allowing the GOA to set detailed rules for capital maintenance, capital, and operating reserve funds through regulation, municipalities may face new or adjusted funding requirements which are currently unknown. Future provincial regulations could directly influence the size, structure, and reporting expectations of the reserve contributions municipalities are required to support.</p>

Seniors Lodges: RMA Analysis

Initial Reaction

Bill 28 centralizes significant decision-making authority with the Minister by introducing key definitions and rules for reserve funds into regulations rather than through legislation. This creates uncertainty for municipalities because major financial and operational decisions for lodges can now be changed without legislative oversight. The Bill also introduces new unknowns around reserve fund requirements, minimum levels, and future requisition expectations. Overall, municipalities are likely to face increased requisitioning requirements, with greater provincial involvement in setting total amounts and contribution levels among participating municipalities.

Autonomy Impact

Changes through Bill 28 reduce municipal autonomy in several ways. By allowing the Minister to redefine “social housing accommodation” and to set standards surrounding reserve funds through regulation, municipalities lose influence over their housing responsibilities and the finances that support them. The ability of HMBs to requisition municipalities is now tied to provincially determined reserve fund rules, which will likely limit municipal discretion in long-term planning, budgeting, and negotiating. The Minister’s authority to add new contributing municipalities puts further limits on local autonomy, as municipalities may be required to fund housing assets that they did not help plan, govern, or approve. It appears that changes related to seniors lodges through Bill 28 shifts responsibility away from municipalities and towards the province, creating a high level of uncertainty. Additionally, new references to capital-related reserves suggest that at an increased portion of responsibility for capital maintenance will be downloaded onto municipalities moving forward.

Rural Impact

Rural municipalities are likely to feel the effects of these changes because any increase or fluctuation in requisition amounts introduces a level of budgetary uncertainty in the short term and has the potential to create long term implications. The Minister’s ability to add new contributing municipalities could pull smaller rural municipalities into funding arrangements without prior involvement, putting pressure on tight budgets and potentially creating intermunicipal tension. With key lodge and reserve fund rules now set through regulation, rural municipalities face a level of uncertainty that they may be less equipped to handle, especially with limited administrative capacity and fewer financial resources.

Assessment and Property Tax

Clarification of “Equity” Within the Regulated Assessment Model, S. 293

Summary	Previous Status	Amended Status	Analysis
<p>The addition of s. 293.1 clarifies how “equity” is determined among properties that are assessed using the regulated model.</p> <p>The new section clarifies that the assessment outcome (assessed value) is not relevant in determining whether assessment among properties is equitable; what is relevant is that the regulated assessment process was appropriately followed.</p> <p>The section also clarifies that the value of a property based on other valuation models is not relevant to defining whether its valuation under the regulated model is equitable.</p>	<p>No previous provision.</p>	<p>s. 293(1.1) For the purposes of subsection (1), an assessment of designated industrial property or machinery and equipment is not unfair or inequitable if</p> <p>(a) the assessor has applied the valuation and other standards and followed the procedures set out in the regulations, and</p> <p>(b) the assessment differs from the assessment of comparable properties or from the results that would be obtained by using other valuation standards</p>	<p>The addition of s. 293 (1.1) is an important and welcome change for municipalities, as it provides clarity as to how equity among regulated properties is defined within the regulated assessment model. Municipal and some industry stakeholders have long held different views on how to determine equity among properties assessed using regulated methods. Municipal stakeholders, including RMA, have taken the position that “equity in process” should be used for regulated assessment, as the regulated model is, by definition, not market-value based, therefore comparing the outcomes of the assessment process (assessed values) should not be relevant as long as the assessment for all properties properly follows the process and methodology prescribed the Minister. In other words, equitable treatment for property owners means that the assessment was conducted appropriately based on the prescribed methodology; the outcomes of the assessments are irrelevant.</p> <p>Some industry stakeholders have argued that equity among properties should be based on their assessed value, or “equity in outcome.” This is a common concept in market value-based assessment models, but because the regulated methodology is specifically designed to not follow market value approaches, applying an equity in value lens to regulated assessment would undermine the process and may require artificial adjustments to assessed values of some properties even if the prescribed assessment methods are followed.</p> <p>This addition will support consistency and objectivity in the regulated assessment model moving forward.</p>

Regulation-Making Authority for Regulated Property Categories, S. 322(1)(d.4) and (e.101)

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 amends s. 322(1) to expand the Minister’s regulation-making authority related to developing categories for regulated property types and applying valuation methodologies for the various categories, as well as addressing “grandfathering” of assessments for existing regulated properties when regulated assessment processes and methodologies are changed, which could have significant and sudden impacts on the assessment value of existing properties.</p>	<p>S. 322(1) did not include specific regulation-making provisions related to categorizing regulated properties or to grandfathering of properties when regulated assessment methodologies or processes are updated.</p>	<p>S. 322(1) is amended to include several subsections providing the Minister with new regulation-making powers, including:</p> <p>(d.4)(i-iii) which allows the Minister to divide regulated property into multiple categories for assessment and assign valuation and other standards that assessors must follow when assessing property in the categories.</p> <p>(e.101)(i-ii) which allows the Minister to apply previous valuation standards or assessments to properties assessed under the regulated model.</p>	<p>The changes to section 322 are intended to support continuation of the assessment model review (AMR) and allow for the Minister to mitigate the impacts of changes to the assessment model on existing properties with a history of assessment under the previous methodology. The Minister has already stated that changes to methodology to determine a regulated property’s base construction costs will only apply to properties that are built, or receive significant capital upgrades, after January 1, 2027. All other properties will continue to have their base costs determined using the previous methodology. This will be allowable based on the addition of s. 322(i)(e.101).</p> <p>The addition of the explicit ability for the Minister to develop more property categories for the purposes of regulated assessment requires further explanation from Municipal Affairs as part of the AMR process. While this may be helpful in allowing more accurate and targeted assessment methodology to be developed for new or emerging regulated property types (such as renewable energy developments and data centres), the reference to “valuation standards” could be interpreted as allowing the Minister to, by regulation, direct an assessment methodology that strays from the cost-based valuation standard applied to regulated property. It is also concerning in the context of the Minister’s statements indicating an interest in pursuing a new property class for mature oil and gas assets.</p>

Property Tax Sub-Class Prohibition, S. 297 & 297.1

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 amends s. 297 to restrict how municipalities may use residential property sub-classes. Municipalities may still create sub-classes within the residential class, but any sub-class for non-primary-residence (NPR) properties cannot be assigned to properties owned wholly or partly by individuals who reside in Alberta. A new transitional section, s. 297.1, requires municipalities to amend any non-compliant bylaws for the 2026 taxation year and correct any resulting assessment or tax errors.</p>	<p>s. 297(2) A council may by bylaw divide class 1 into sub-classes on any basis it considers appropriate, and if the council does so, the assessor may assign one or more sub-classes to property in class 1.</p> <p>(2.01) [did not exist]</p> <p>(2.02) [did not exist]</p> <p>s. 297.1 [did not exist]</p>	<p>New s. 297(2.01) prohibits assessors from assigning an NPR sub-class to any residential property owned wholly or partly by individuals who “reside in Alberta,” defined in s. 297(2.02) as living in Alberta for at least 183 days in the current or previous year and not intending to reside elsewhere. NPR sub-classes may therefore only be applied to properties owned by non-residents.</p> <p>s. 297.1 establishes a transitional process requiring municipalities to amend any non-compliant residential sub-class bylaws for the 2026 taxation year within 45 days, correct any resulting assessment or tax errors, and provide amended bylaws to the Minister. If passed, this amendment is deemed to have come into force on January 1, 2026.</p>	<p>These amendments introduce a substantive limitation on municipal authority to differentiate tax treatment within the residential class. While municipalities may continue to create NPR sub-classes, these sub-classes can no longer be applied to properties owned wholly or partly by individuals who meet the statutory definition of residing in Alberta. In effect, NPR sub-classes become a tool that can only be applied to properties owned by non-residents, regardless of how the property is used.</p> <p>This restriction narrows municipal flexibility to address local housing or taxation issues through differentiated residential tax rates. Municipalities that previously used, or were considering using, NPR sub-classes to influence vacancy, redevelopment, or housing availability will now be limited in their ability to apply those tools.</p> <p>It is RMA’s understanding that the creation of the restrictions to s. 297 are in response to developer and government concerns with the use of an NPR-related sub-class in a specific municipality. While RMA does not have a position on the instance that appears to have driven this legislative change, it is concerning that the Government of Alberta has significantly reduced municipal autonomy in this area in response to a single local example.</p> <p>The amendments reduce municipal discretion in shaping residential tax policy and introduce short-term administrative pressures for municipalities that had already begun implementing NPR sub-classes. The changes primarily affect municipalities that use residential sub-classes; those without such subclasses will see minimal impact.</p>

Regulated Assessment Compliance and Reporting Requirements, S. 322(1)(e.102)

Summary	Previous Status	Amended Status	Analysis
<p>The addition of s. 322(1)(e.102) empower the Minister to make regulations that impose fines or administrative penalties on persons responsible for responding to assessor information requests for regulated properties. While the ability of assessors to make information requests previously existed, there was no provision to penalize non-compliance.</p>	<p>No previous provision.</p>	<p>s. 322(1) (e.102) respecting administrative penalties for the purposes of section 295(1.1), including</p> <ul style="list-style-type: none"> (i) penalty amounts, (ii) the contents of notices of administrative penalties, (iii) timelines for payment of penalties, (iv) appeals of administrative penalties, (v) limitation periods, (vi) service of notices and documents, and (vii) enforcement of administrative penalties; 	<p>Both provincial and municipal assessors have long faced non-compliance from some regulated property owners in relation to providing requested information required to inform assessments. Based on information shared by the Minister of Municipal Affairs, the regulation will apply a \$10,000 fine for non-compliance with assessor information requests, and only the provincial assessor (not municipal assessors) will be able to levy the fine.</p> <p>While the addition of s. 322(1)(e.102) is a positive step in holding regulated property owners accountable for providing information required for assessments, the relatively low maximum amount may limit its effectiveness. It is also disappointing that the powers will only apply to the provincial assessor; this will create an inequity in authority among provincial and municipal assessors, and could result in greater inconsistencies in assessment accuracy.</p>

Assessment and Property Tax: RMA Analysis

Initial Reaction

The regulated assessment model is both complex and crucially important to rural municipalities and industries such as oil and gas, forestry, renewable energy, and others. The Minister has stated that the intent of most assessment-related changes in Bill 28 is to clarify the function of the regulated model, or to provide a path for implementation of possible changes to regulated assessment rates that may be the result of the ongoing Assessment Model Review.

S. 293.1 is crucial to embedding in legislation that the concept of “equity” in the regulated model is based on proper and consistent application of the regulated model across properties, rather than the assessment outcome (value). Because the market-based assessment model used for most residential and commercial properties in Alberta is not suited to large industrial properties, the regulated model was created, and continues to exist, to assess those properties using a regulated process, created by the Minister, to ensure equitable assessments for both regulated property owners and municipalities. S. 293.1 re-affirms the process-based approach to equity in the regulated model.

Changes to s. 322, and in particular the ability to add additional rate categories, will have unknown impacts on municipalities and industry. While additional rates may be warranted for some property types, any additional standardization must be developed through the assessment model review, be based on sound data, and must ensure that any new standardized rates fully reflect actual construction costs of regulated assets.

Autonomy Impact

The assessment-related changes are unlikely to directly impact municipal autonomy, as s. 293.1 further confirms the continuation of a cost-based regulated assessment model. While s. 322 amendments may result in a shift in how some regulated properties are assessed which could have fiscal impacts on municipalities, autonomy should not be directly impacted. The exception to this is the stated scope of penalty provisions for non-reporting of information required for assessment (s. 322(1)(e.102)). If these provisions ultimately apply only to the provincial assessor and not municipal assessors, it will result in reduced municipal autonomy to conduct regulated assessments based on fulsome data.

Beyond assessment, the creation of s. 297(2.01), restricting use of residential sub-classes, poses significant autonomy risks for municipalities. While this particular change is unlikely to impact most rural municipalities, it creates a precedent for restriction of tax rate sub-class powers. Given that municipalities have limited revenue-generation tools and already have less flexibility to create sub-classes than municipalities in most Canadian jurisdictions, this decision is concerning and disproportionate.

Rural Impact

Any changes to the regulated assessment model will have impacts on rural municipalities. As mentioned, the introduction of s. 293.1 is crucial in further embedding the link between assessment process and equity in the regulated model, which will contribute to long-term assessment stability and predictability. The impacts of s. 322 changes related to regulated property rates remain to be seen, but they do open the door to further use of standardized rates, which will be problematic if applied to properties where data is insufficient.

Governance and Accountability

Ministerial Authority Over Municipal Dissolution Decisions, S. 130.1

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 makes the resident vote following a viability review non-binding. After electors vote on whether a municipality should dissolve, the Minister has full discretion to recommend dissolution to Cabinet or to direct the municipality to take actions intended to support viability. The Minister’s decision is no longer tied to the outcome of the public vote.</p>	<p>s. 130.1(2) Where a vote of the electors is held under subsection (1)(b),</p> <p>(a) if the electors vote that the municipality should be dissolved, the Minister must recommend to the Lieutenant Governor in Council that the municipality be dissolved in accordance with section 133, or</p> <p>(b) if the electors vote that the municipality should not be dissolved, the Minister may by order direct the council or the chief administrative officer to take the actions referred to in subsection (1)(b)(ii).</p>	<p>s. 130.1(2) After a vote of the electors is held under subsection (1)(b), the Minister may</p> <p>(a) recommend to the Lieutenant Governor in Council that the municipality be dissolved in accordance with section 133, or</p> <p>(b) by order direct the council or chief administrative officer to take any actions that the Minister considers appropriate to ensure the viability of the municipality.</p> <p>(3) When making a recommendation or order under subsection (2), the Minister is not bound by the results of the vote held under subsection (1)(b).</p>	<p>The amendments provide the Minister with significant decision-making authority by making viability votes advisory rather than binding. The change from “must” to “may” removes the requirement for the Minister to follow the outcome of the public vote, giving the Minister full discretion to recommend dissolution or impose remedial measures regardless of how electors voted.</p> <p>The Minister’s discretion under the amended section is broad. The amendment does not limit the actions that may be ordered to support viability, nor does it prescribe criteria for when dissolution should be recommended. This represents a meaningful change to the viability review process, where the public vote previously determined the Minister’s next steps.</p> <p>For municipalities, this shift raises questions about how viability votes will be weighed in practice and under what circumstances the Minister will choose dissolution over corrective measures. The non-binding nature of the vote may also influence public expectations and the dynamics of viability review processes.</p> <p>Because the legislation provides no guidance on how this discretion will be exercised, municipalities will need clarity from Municipal Affairs on the circumstances in which dissolution may be recommended despite a contrary vote, and how viability concerns will be assessed going forward.</p>

Councillor Accountability Framework, S. 146.01-09

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 creates Division 1.1, which establishes a councillor accountability framework. The Minister may, by regulation, set conduct standards, complaint procedures, investigative powers, sanctions, and appeal processes. The framework introduces provincially designated investigators and appeals commissioners, formalizes complaint and investigation procedures, and gives the Minister final authority over determinations and sanctions.</p>	<p>After the Municipal Affairs Statutes Amendment Act, 2025 (Bill 50) came into force, municipalities were explicitly prohibited from governing councillor behaviour or conduct by way of bylaw or resolution, and all existing codes of conduct were repealed. This left no local authority to set conduct standards or manage complaints, aside from the existing pecuniary interest and disqualification MGA provisions.</p>	<p>Bill 28 introduces s. 146.01-09, which:</p> <ul style="list-style-type: none"> • authorizes the Minister to establish a binding accountability framework by regulation, including rules on conduct, confidentiality, use of municipal assets, pecuniary interest, and defined forms of misconduct; • empowers the Minister to designate investigators and appeals commissioners; • creates formal complaint, investigation, preliminary review, reporting, and sanctioning processes; • requires councils to determine whether a contravention occurred and to apply sanctions; • establishes a provincial appeal mechanism where the Minister makes the final determination and may impose sanctions; and • allows regulations to modify or replace existing MGA provisions related to councillor conduct. 	<p>The new accountability framework is intended to fill the gap created by Bill 50, but does so by centralizing control over the scope of issues that warrant a formalized complaint process, as well as by introducing significant standardization of the process itself. The legislation is largely enabling, as many substantive elements – conduct standards, complaint procedures, investigative powers, timelines, sanctions, publication rules, fees, and even key definitions – will be set through regulation. Regulations may also modify or replace existing MGA provisions, giving the Minister broad discretion to shape how councillor conduct is governed.</p> <p>This shift means that procedural and substantive rules related to the scope of issues addressed through the framework, which were previously set locally, will now be determined provincially. The process related to complaints, investigations, sanctions, and appeals will be standardized, and municipalities will need to align their practices with the provincially established framework once released.</p> <p>For municipalities, the framework is likely to introduce more formal and resource-intensive processes, including investigation management, documentation, and compliance with prescribed timelines and reporting requirements. The scale of these impacts remains uncertain until regulations are developed.</p> <p>Given the breadth of the Minister’s regulation-making authority, it will be important for Municipal Affairs to engage closely with municipalities ensure the final framework reflects local capacity, governance realities, and operational constraints.</p>

Governance and Accountability: RMA Analysis

Initial Reaction

The amendments in this theme significantly expand provincial authority over municipal governance, reducing the influence of local electors and councils in decisions that directly affect their communities. Making viability votes non-binding shifts dissolution decisions entirely into provincial discretion; it is RMA's expectation that any decision that contradicts a community's expressed direction will require clear, transparent justification from the Minister.

The councillor accountability framework represents an even more substantial shift. Although the legislation identifies broad categories of misconduct, the detailed definitions, thresholds, and procedural requirements will be established later through regulation, meaning many key elements of the framework remain unknown. This uncertainty extends to how investigations will operate, how third-party investigators will be selected, how appeals will function, and how costs will be allocated. What is clear is that the framework will introduce more formal, resource-intensive, and potentially costly processes without any committed provincial funding or capacity supports.

The introduction of a provincial accountability framework does provide an opportunity to restore clarity and consistency following the repeal of codes of conduct under Bill 50. RMA expects the province to engage closely with stakeholders to ensure the framework is practical, clearly defined, respectful of the roles of elected officials and administrators, and that municipalities are not required to absorb significant costs.

Autonomy Impact

Making viability votes advisory rather than binding reduces the role of local electors in determining their community's future and places dissolution decisions entirely within provincial discretion. Without criteria guiding when the Minister may override a vote, municipalities face reduced certainty and diminished local control over a decision with significant long-term implications.

The councillor accountability framework further centralizes authority by shifting control over conduct standards, complaint processes, investigations, sanctions, and appeals from councils to the province. Regulations may override existing MGA provisions, meaning municipalities will be required to adopt provincially prescribed processes regardless of local context or capacity. This represents a substantial rebalancing of authority away from councils and toward ministerial oversight.

Rural Impact

Rural municipalities may experience significant downstream impacts from these changes. When viability outcomes lead to the dissolution of neighbouring municipalities, rural municipalities often assume substantial new responsibilities, including expanded service delivery and infrastructure obligations. These transitions can carry long-term financial and operational implications, particularly given that provincial transitional support has historically been limited. The shift to a non-binding vote therefore carries meaningful consequences for rural municipalities, and clear justification will be essential in any case where provincial decisions diverge from local direction.

The councillor accountability framework may also impose disproportionate administrative and financial pressures on rural municipalities. Formalized complaint and investigation processes, coordination with provincially designated investigators, strict timelines, and potential investigation or appeal costs may be challenging to absorb without additional support. These changes introduce more complex and resource-intensive governance requirements at a time when many rural municipalities already face capacity constraints.

Municipal Transparency

Business Improvement Area Governance, S. 53

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 establishes the Minister’s regulation-making authority over Business Improvement Areas (BIAs). While BIAs remain locally established entities, the procedural requirements for their creation, amendment, operation, boundary changes, and disestablishment will now be set through provincial regulation. This shifts certain aspects of BIA governance from municipal discretion to provincial oversight, particularly around notice and procedural requirements.</p>	<p>s. 53 The Minister may make regulations</p> <p>(a) respecting the establishment of a business improvement area;</p> <p>(b) setting out what must be included in a business improvement area bylaw;</p> <p>...</p> <p>(e.1) [did not exist]</p>	<p>s. 53 The Minister may make regulations</p> <p>(a) respecting the establishment or change in boundary of a business improvement area;</p> <p>(b) respecting business improvement area bylaws, including</p> <p>(i) what the council must include in a business improvement area bylaw,</p> <p>(ii) what the council may include in a business improvement area bylaw, and</p> <p>(iii) amendments to a business improvement area bylaw;</p> <p>...</p> <p>(e.1) respecting the notices that must be provided in respect of the establishment, operation, amendment, change in boundary and disestablishment of a business improvement area or the board of a business improvement area;</p>	<p>While BIAs remain locally initiated and governed, the Minister may now set detailed rules for bylaw content, bylaw amendments, boundary changes, and the notices that must be provided for the establishment, operation, amendment, and disestablishment of a BIA or its Board.</p> <p>This represents a centralization of procedural oversight. Previously, councils determined most notice and process requirements through local bylaws. Under the amended section, these requirements will be standardized through regulation, reducing local flexibility but potentially increasing consistency and transparency across municipalities.</p> <p>The practical impact will depend on the forthcoming regulations. Depending on how prescriptive they are, municipalities may need to adjust existing BIA bylaws, notice practices, and administrative processes to ensure compliance.</p>

CAO Natural Person Powers Reporting, S. 208(1) & 208(3)

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 introduces a requirement for the CAO to notify council in writing after each use of the municipality’s natural person powers, subject to defined exceptions. The amendment establishes timelines and delivery methods for these notices while exempting several administrative and operational actions. Bill 28 also repeals the unproclaimed natural person powers reporting provision enacted under Bill 50, replacing it with a more detailed framework.</p>	<p>s. 208(1) The chief administrative officer must ensure that . . . (e) [did not exist] s. 208(3) [did not exist]</p>	<p>s. 208(1)(e) requires the CAO to notify council in writing after each use of the municipality’s natural person powers, subject to defined exceptions.</p> <p>s. 208(3), sets out:</p> <ul style="list-style-type: none"> • acceptable delivery methods (personal delivery, email, or at a public meeting), • a deadline (the earlier of the next council meeting or 14 days), and • circumstances where notice is not required (actions authorized by council, personnel matters, routine operational matters, emergency responses, or seeking legal advice). 	<p>These amendments establish a reporting requirement for the CAO’s use of the municipality’s natural person powers; the new provisions require written notice to council within a defined timeline and through specified delivery methods.</p> <p>The exceptions are intended to narrow the scope of mandatory reporting and reduce the administrative burden that had been anticipated under the earlier framework introduced by Bill 50.</p> <p>However, several reporting requirement exceptions, such as “routine operational matter” and “personnel matter,” remain undefined, leaving some interpretive uncertainty depending on context and local practice. While the amendment clarifies when reporting is required, it does not fully eliminate ambiguity. It functions as a refinement of Bill 50’s open-ended approach, rather than a departure from it.</p> <p>RMA input on the previous natural person powers provisions included in Bill 50 highlighted several concerns that remain relevant. RMA noted that “natural person powers” encompass a wide range of day-to-day administrative activities, raising questions about how reporting obligations might affect the division between governance and administration. There were also concerns about increased administrative workload, the potential for political interference in operational decisions, and uncertainty about how compliance would be assessed. These issues persist to some degree under the revised framework, as the underlying ambiguity around what constitutes a reportable use of natural person powers – and what problem the reporting requirement is intended to solve – remain unresolved.</p>

Councillor Information Access & Substantial Information Requests, S. 208.1

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 restructures the councillor information-access framework by creating three procedural streams for information requests: publicly available information, “substantial information requests,” and all other requests that remain subject to the existing 72-hour disclosure rule. Councils may define substantial information requests by bylaw and set local procedures for how they are handled, including any required council resolutions and reporting expectations. The Minister’s regulation-making authority is expanded to include oversight of substantial information request bylaws.</p>	<p>s. 208.1(1) Councillors requesting information under s. 153(d) were entitled to receive it from the CAO as soon as practicable, subject to subsection (2) and any regulations.</p> <p>s. 208.1(2) The CAO could refuse to provide personal or confidential information after considering statutory factors.</p> <p>s. 208.1(3) Information provided to one councillor had to be provided to all councillors within 72 hours.</p> <p>s. 208.1(4) The CAO was required to provide reasons for refusing a request.</p> <p>s. 208.1(5) The Minister could make regulations on procedures and additional confidentiality factors.</p>	<p>Retains councillors’ right to access information necessary to perform their duties.</p> <p>Adds new subsections (3.1)-(3.4), which:</p> <ul style="list-style-type: none"> • Changes the language to say the CAO may share publicly available information with all councillors and removes the 72-hour requirement, • Introduces the concept of “substantial information requests,” • Authorizes councils to define substantial requests by bylaw and establish local procedures (e.g., requiring a council resolution before the CAO must comply, or imposing reporting requirements). <p>Maintains the requirement to provide reasons for refusing a request.</p> <p>Expands the Minister’s regulation-making authority to include substantial information requests and related bylaws.</p>	<p>The amendments create a three-stream framework for councillor information access. The existing process in s. 208.1(1) and (3) continues to apply to information requests that do not fall into one of the new categories, requiring the CAO to provide the information as soon as practicable and to share it with all councillors within 72 hours. Publicly available information is treated differently under s. 208.1(3.1), as the CAO may (but is not required to) share it with all councillors. A third stream is introduced through “substantial information requests,” which councils may define by bylaw and for which local procedures may be established, including whether a council resolution is required before the CAO must comply and what form of reporting to council is required.</p> <p>As the legislation does not define what constitutes a substantial information request, municipalities will need to establish criteria through bylaw to support consistent application. Clear definitions and procedures will help ensure both council and administration understand when the 72-hour disclosure requirement applies and how substantial requests are to be processed.</p> <p>Concerns previously raised by RMA when this provision was introduced in Bill 50 remain relevant, as s. 208.1(2)(d) continues to allow the CAO or designate to consider “any other relevant factor” when deciding whether to release personal or confidential information. The breadth of this clause may create uncertainty for administrations in determining what must be weighed and increases the risk of inadvertent disclosure if a factor later deemed relevant was not considered.</p>

Public Disclosure of Employee Compensation, S. 215.1-7

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 adds sections 215.1-7 to the MGA, requiring municipalities, beginning in 2027, to annually publish compensation information for employees whose total compensation and severance exceed the threshold set under the <i>Public Sector Compensation Transparency Act</i> (PSCTA). Municipalities must post specified details on their website, notify the Minister if no employees exceed the threshold, and follow Minister- determined processes for reporting and corrections. The amendments include safety-based exemptions, audit and enforcement powers for the Minister, transitional protections for pre-2026 confidentiality clauses, and statutory immunity for disclosures made in accordance with these requirements.</p>	<p>No previous provision.</p>	<p>s. 215.1 defines key terms, including compensation, non-monetary benefits, severance, and the threshold tied to the PSCTA.</p> <p>s. 215.2 requires municipalities, starting in 2027, to publish by June 30 the name, position, compensation, non-monetary benefits, and severance of employees whose total compensation and severance exceed the threshold, or to publish a notice and inform the Minister if none do. Municipalities must submit information to the Minister before publication, and a safety-based exemption is available. Division 2 of Part 1 of the <i>Access to Information Act</i> does not apply.</p> <p>s. 215.3 authorizes the Minister to order audits, with municipalities required to cooperate and responsible for associated costs.</p> <p>s. 215.4 provides a temporary exemption for employees with pre-2026 contractual confidentiality rights, ending at expiry, waiver, or December 31, 2027.</p> <p>s. 215.5 allows the Minister to publicly disclose municipal non-compliance.</p> <p>s. 215.6 provides statutory immunity for disclosures made under s. 215.2.</p> <p>s. 215.7 authorizes regulation-making.</p>	<p>The amendments expand provincial oversight of municipal employment practices by introducing a standardized compensation-disclosure framework aligned with provincial public-sector reporting. The amendments reflect direction from the Minister of Municipal Affairs’ 2025 mandate letter and represents a shift toward greater provincial influence over municipal operations, particularly in how municipalities structure and report employee compensation.</p> <p>The new requirements add administrative complexity for municipalities, including mandatory pre-publication reporting to the Minister, compliance with Minister-established correction processes, and the possibility of internal or external audits. These oversight tools strengthen provincial enforcement but may increase administrative and financial pressures, particularly for smaller or rural municipalities with limited capacity.</p> <p>Expanding salary disclosure to municipal staff raises privacy concerns and may affect municipal workforce stability. Publicizing individual compensation can discourage prospective applicants or current employees who prefer greater privacy, increasing the risk of a chilling effect on recruitment and retention. This impact may be more pronounced in smaller or rural municipalities that already face challenges attracting and retaining qualified administrative professionals.</p>

Policing Cost Transparency on Tax Notices, S. 334

Summary	Previous Status	Amended Status	Analysis
<p>Section 334(4) authorizes municipalities to disclose, directly on the annual tax notice, the specific portion of municipal tax rates and resulting tax amounts that are used to fund policing costs under the <i>Police Act</i>.</p>	<p>No previous provision.</p>	<p>s. 334(4) Despite subsection (2), a tax notice may show, separately from all other tax rates shown on the notice,</p> <p>(a) the portion of the tax rates set by the property tax bylaw that is required to raise the revenue to pay the amounts owing under section 4(1) of the <i>Police Act</i> or under an agreement referred to in section 22(1) of the <i>Police Act</i>, and</p> <p>(b) the amount of tax imposed in respect of the portion of the tax rates referred to in clause (a).</p>	<p>Section 334(4) lets municipalities display policing costs as a separate line on tax notices, but it does not let them treat policing as a true requisition.</p> <p>This amendment functions primarily as a communication tool, through which municipalities can show residents what portion of their taxes are driven by provincial policing obligations. This may help explain rising tax pressures, but there is no mechanism for rural municipalities to separate policing costs from their general tax rate as an actual requisition.</p> <p>When policing costs rise, municipalities must raise taxes for residents or cut funding for other essential services to account for the charge. In Fall 2024, RMA members passed Resolution 4-24E, calling for an amendment to the MGA to classify the PFM levy as a requisition. This resolution was driven by concerns over the transparency of PFM costs and the need for residents to be fully aware of their contributions toward policing services.</p> <p>A separate requisition would clearly show that policing costs are imposed externally and collected by municipalities on behalf of the Government of Alberta. With changes through Section 334(4), it may still leave the impression that the municipality itself is responsible for the increased costs. This can lead to frustrations when policing costs are rising significantly, likely with no accompanying visible increases to service levels.</p>

Municipal Transparency: RMA Analysis

Initial Reaction

The amendments within this theme introduce several new governance and information-management requirements for municipalities. While transparency is an important principle, the intent behind these changes is not clearly articulated, and it remains unclear what specific problems they are intended to solve. Without clarity, the risk is that municipalities will face new processes and obligations that may not meaningfully improve accountability or public understanding.

The amendments collectively expand provincial influence over internal municipal processes, ranging from CAO reporting, councillor information access, employee compensation disclosure, to BIA governance processes, and even how provincially imposed policing costs may be displayed on tax notices. While this last change allows municipalities to show policing costs separately, it does not permit them to treat the Police Funding Model levy as a requisition, meaning municipalities must still fund the obligation from their own tax base on the province's behalf. While some of the amendments provide varying levels of clarity, overall, they increase provincial oversight with uncertain benefits, particularly given the absence of a clear rationale showing how these changes will enhance transparency or public trust.

Autonomy Impact

The amendments narrow municipal autonomy by prescribing how internal information must be managed, reported, and disclosed. Requirements for CAO reporting on natural person powers introduce provincial expectations into administrative decision-making, creating the potential for blurred governance-administration boundaries, particularly given that several key exceptions such as "routine operational matter" and "personnel matter" remain undefined. As a result, the amendments refine but do not fundamentally resolve the ambiguity introduced under Bill 50, and municipalities will likely face challenges in determining what constitutes a reportable action.

A similar challenge arises with the councillor information-access amendments. Although municipalities may now define "substantial information requests" through bylaw, the legislation does not itself define the term, leaving municipalities to determine the threshold without statutory guidance. The new framework effectively creates three categories of information: publicly available information, "substantial information" to be governed by bylaw, and all other requests that default to the existing process in which the CAO must provide information to the requesting councillor as soon as practicable and then share it with all councillors within 72 hours of doing so. If information is not clearly captured in a substantial information request bylaw, it falls into this third category, which could trigger broad reporting obligations. This recreates concerns RMA raised when the Bill 50 provisions were introduced: that large volumes of information could still fall into this catch-all category, increasing administrative workload and creating potential tension between councils and administrations.

Further to this, Bill 28 expands the Minister's regulation-making authority to include substantial information requests and the bylaws that govern them. While municipalities may draft their own bylaws, the Minister now has the ability to prescribe requirements or procedures that may not reflect local dynamics or administrative capacity, further constraining municipal autonomy.

Rural Impact

Rural municipalities may face disproportionate impacts from the transparency amendments due to limited administrative capacity and the broad operational responsibilities inherent to smaller organizations. New reporting and disclosure requirements, particularly those related to natural person powers and councillor information access, could strain already stretched administrations, as even modest increases in information-management responsibilities can have significant effects in rural contexts.

Ambiguity around what constitutes a reportable action or a substantial information request may heighten the risk of administrative burden and political tension, especially where CAOs perform multiple operational roles. The compensation-disclosure framework may also pose challenges in rural communities, where employees are easily identifiable and privacy concerns can affect recruitment and retention.

Public Institutions

Expanded Ministerial Inspection Powers for Public Libraries, S. 39 (*Libraries Act*)

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 expands the Minister’s inspection powers under s. 39 of the <i>Libraries Act</i>. Previously limited to reviewing a Board’s records, the Minister may now appoint inspectors to examine any matter related to the management, administration, or operation of a public library, including library property, services, and staff information. Inspectors may require employees to provide information, and the Minister may issue any order considered appropriate following an inspection.</p>	<p>s. 39(1) The Minister or a person authorized in writing by the Minister may, during regular business hours, inspect the records of a board.</p> <p>s. 39(2) A person authorized under subsection (1) shall, while inspecting the records of a board, carry identification in the prescribed form and present it on request.</p>	<p>s. 39(1) defines “library service point.”</p> <p>s. 39(2) authorizes the Minister to appoint inspectors to review any matter related to a public library’s management, administration, operation, or compliance with the Act and regulations.</p> <p>s. 39(3) permits inspectors to inspect library property and services, examine and copy relevant records, and require employees to provide information.</p> <p>s. 39(4)-(5) require inspections to occur during regular business hours and for inspectors to carry prescribed identification.</p> <p>s. 39(6) requires inspectors to report findings to the Minister and provide a copy to the Board.</p> <p>s. 39(7) allows the Minister to make any order considered appropriate following an inspection.</p>	<p>The amendments significantly broaden the Minister’s authority over public libraries by transforming s. 39 from a narrow records-inspection provision into a comprehensive operational oversight tool. Inspectors may now review any aspect of a library’s management, administration, or service delivery, extending provincial oversight into areas previously left to local governance.</p> <p>The expanded inspection authority results in a more active provincial role in overseeing library operations, allowing the Minister to review operational practices, service delivery, and compliance in ways that were not previously authorized.</p> <p>These changes may also introduce additional administrative demands for library boards and staff, who may need to allocate time and resources to support inspections, prepare documentation, and respond to information requests. Depending on the frequency and breadth of inspections, there could be associated financial implications, such as staff time, record-management requirements, or the need to implement operational adjustments in response to Ministerial orders. The expanded powers also raise concerns about potential impacts on the autonomy of locally governed library boards.</p>

Ministerial Guidance for Library Governance, S. 40 & 40.1 (*Libraries Act*)

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 expands the Minister’s authority to regulate access to and use of public library property, including the ability to create age-based restrictions on borrowing or use. It also introduces a new section, s. 40.1, allowing the Minister to issue publicly available guidelines interpreting or applying these regulations.</p>	<p>s. 40 allowed the Minister to make regulations, but did not include authority over access, use, or borrowing of library property.</p> <p>s. 40(b.1) [did not exist]</p> <p>s. 40.1 [did not exist]</p>	<p>s. 40(b.1) authorizes the Minister to make regulations respecting access to, use of, and borrowing of public library property by members of the public, including regulations that restrict access, use, or borrowing based on age.</p> <p>s. 40.1(1) allows the Minister to issue guidelines on how regulations made under s. 40(b.1) should be interpreted or applied.</p> <p>s. 40.1(2) requires the Minister to make such guidelines publicly available in a manner the Minister considers appropriate.</p>	<p>These amendments expand the Minister’s authority to establish rules governing how the public accesses and uses library property, including the ability to establish age-based restrictions. Decisions about borrowing privileges, access to materials, and circulation policies have historically been made by local library boards, so this represents a shift toward more centralized provincial direction.</p> <p>The practical impact of these amendments will depend on the scope of future regulations. Municipal Affairs’ Fact Sheet indicates that upcoming rules may address age-appropriate access to materials containing explicit visual content which could require libraries to adjust how certain materials are stored, accessed, or borrowed.</p> <p>The addition of s. 40.1 allows the Minister to issue guidelines interpreting these regulations, which may further shape how local boards implement provincial requirements. This may have implications for the traditional autonomy of locally governed library boards, though the degree of impact will depend on how prescriptive future regulations and guidelines become.</p>

Authority Over Municipal Public Utility Governance, S. 44.1

Summary	Previous Status	Amended Status	Analysis
<p>Bill 28 introduces s. 44.1, giving Cabinet the authority to require a municipality to transfer ownership or control of a public utility to a designated “public utility entity.” Future regulations may determine governance, operations, asset transfers, and which parts of the MGA apply. This introduces a new provincial mechanism for intervening in municipal utility governance and service delivery.</p>	<p>No previous provision.</p>	<p>s. 44.1(1) Defines “public utility entity” as:</p> <ul style="list-style-type: none"> • a controlled corporation; • a regional services commission; or • any other entity prescribed by regulation. <p>s. 44.1(2) Authorizes the Lieutenant Governor in Council to make regulations:</p> <ul style="list-style-type: none"> • prescribing additional public utility entities; • requiring a municipality to transfer ownership or control of a public utility to such an entity. <p>s. 44.1(3) Regulations may:</p> <ul style="list-style-type: none"> • set out governance, operation, and management of the public utility entity; • address the transfer of assets, employees, and operations; • modify or exclude MGA provisions; • apply generally or specifically; • prevail over the MGA where inconsistent. • address any additional matters the Lieutenant Governor in Council considers necessary to carry out the purposes of this section. 	<p>This amendment establishes new provincial authority to alter the governance of municipal public utilities. By allowing Cabinet to require a municipality to transfer ownership or control of a utility to a designated entity, s. 44.1 introduces a level of provincial intervention not previously present in the MGA. This raises important considerations for municipal autonomy.</p> <p>The intent of this authority has not been articulated, and further clarity will depend on forthcoming regulations. Until regulations are developed, municipalities have limited visibility into the circumstances under which Cabinet might compel a transfer, the criteria that would guide such a decision, or the possible form of “public utility entities” that may be created through regulation.</p> <p>The regulation-making powers under s. 44.1 allow Cabinet to determine governance structures, operational models, the terms of asset and staff transfers, and to override portions of the MGA. This creates uncertainty for municipalities, residents, and businesses until the regulatory framework is defined, and could, in theory, impact governance, costs, and service levels associated with public utilities.</p> <p>From an RMA perspective, any use of this authority should be guided by clear criteria, transparent processes, and meaningful collaboration with affected municipalities. Local expertise, operational realities, and the importance of municipal autonomy should be central considerations in any decision to alter the governance of public utilities. The ability for the Lieutenant Governor in Council to prescribe “any other entity” as a public utility entity under s. 44.1(1)(c) further underscores the need for clarity, as this could include entities beyond traditional municipal or regional structures.</p>

Public Institutions: RMA Analysis

Initial Reaction

The amendments within this theme introduce new provincial mechanisms to intervene in the governance of public institutions, specifically municipal utilities and public libraries. The changes introduce oversight provisions that significantly expand provincial involvement in institutions traditionally governed locally, reducing municipal and board-level decision-making authority and shifting control to the province. The extent of these impacts will depend on how these powers are applied through future regulations, leaving municipalities uncertain about the potential implications for governance, operations, and service delivery. It is currently unclear what circumstances or thresholds may be used to activate the new powers, particularly related to public utilities.

Autonomy Impact

The most consequential autonomy impact arises from s. 44.1, which allows Cabinet to require a municipality to transfer ownership or control of a public utility to a designated entity. Municipalities currently have no clarity on the criteria that would trigger such a transfer, the governance structures that may be imposed, or the implications for assets, staff, and service levels or service costs. The ability for Cabinet to prescribe “any other entity” as a public utility entity further underscores the breadth of this authority, allowing future governance structures to be defined entirely through regulation and creating uncertainty about the types of entities that may ultimately assume control of municipal utilities. Until regulations are developed, municipalities face considerable uncertainty regarding the future governance of their utilities.

The amendments to the *Libraries Act* expand provincial authority by allowing the Minister to inspect any aspect of a library’s management, administration, or operations and by enabling new regulations and guidelines governing access to and use of library property. These changes extend provincial involvement well beyond the previous records-focused provisions and shift certain decisions from local authorities. As a result, library boards and associated municipal representatives may face increased oversight in an area traditionally governed at the local level.

Rural Impact

In rural communities, utilities and libraries are closely tied to local decision-making and community identity. Centralizing authority over these services may have a more pronounced impact in rural areas, where changes imposed externally may not align with local priorities or existing service practices. The potential for provincially directed governance shifts introduces uncertainty for rural municipalities, residents, and businesses who rely on locally responsive service delivery.

Preliminary Analysis of Bill 28: Municipal Affairs & Housing Statutes Amendment Act, 2026



April 17, 2026

Preliminary Analysis of Bill 28: Municipal Affairs and Housing Statutes Amendment Act, 2026

Preliminary Analysis of Bill 28: Municipal Affairs and Housing Statutes Amendment Act, 2026

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Preliminary Analysis of Bill 28: Municipal Affairs and Housing Statutes Amendment Act, 2026

Background

On April 2, 2026, the Government of Alberta released Bill 28, the [Municipal Affairs and Housing Statutes Amendment Act](#), which proposes amendments to the *Municipal Government Act* (MGA), the *Alberta Housing Act*, and the *Libraries Act*.

ABmunis' Perspective

Some of the proposed legislative changes reflect ongoing advocacy on items first presented in Bill 50, the *Municipal Affairs Statutes Amendment Act, 2025*. ABmunis submitted recommendations and [analysis](#) on Bill 50 to Municipal Affairs related to:

- The elimination of codes of conduct
- Use of natural persons powers
- Standard meeting procedures
- Councillor information requests

We appreciate that Municipal Affairs acknowledged concerns raised by municipalities, ABmunis, and the Rural Municipalities of Alberta (RMA). The Ministry has since introduced amendments through Bill 28 to mitigate those concerns.

Support of the New Councillor Accountability Framework

ABmunis supports the proposed introduction of a Councillor Accountability Framework, as well as the inclusion of third parties to investigate complaints under this framework. ABmunis, along with RMA and municipalities across Alberta, have expressed concerns with the elimination of codes of conduct since their repeal in Bill 50. In addition, under the previous code-of-conduct bylaws, ABmunis and RMA had advocated for an independent third-party integrity commissioner to investigate complaints. Although an independent office has not been established, we are pleased to see that Bill 28 introduces a third party to investigate complaints, ensuring a consistent and accountable investigation process.

Concerns with Further Erosion of Local Autonomy and Added Cost Pressures

Bill 28 continues to raise significant and persistent concerns related to municipal autonomy. The proposed legislation introduces several provisions that risk eroding the independence and self-governance of local councils, including items related to:

- Implementation of standard meeting procedures
- Results from viability review votes
- Implementation of community design codes
- Limitations on vacancy property tax
- Public utility governance
- Approval of aggregate pits

In addition, ABmunis identifies that several proposed provisions may lead to significant and potentially unsustainable cost pressures for municipalities across Alberta. ABmunis will continue to highlight mounting cost pressures and the cumulative impact that those pressures have on municipalities across Alberta through our [Property Taxes Reimagined](#) project.

The following analysis includes areas where ABmunis has identified risk to municipal autonomy, potential for increased financial strain, and areas where additional feedback from members is required to support future advocacy efforts.

Preliminary Analysis of Bill 28: Municipal Affairs and Housing Statutes Amendment Act, 2026

Next Steps and Change Management

ABmunis remains committed to raising our questions and concerns with Municipal Affairs so the Ministry is fully informed about what these proposed changes would mean for municipalities. If passed, Bill 28 will require significant work by ABmunis, other municipal associations, the Government of Alberta, and municipalities to develop the regulations enabled through the proposed legislation. Regulations are proposed for:

- The Councillor Accountability Framework
- Automatic Yes for development permits
- Non-statutory studies related to development
- Community Design Codes
- Assessment of Designated Industrial Property
- Governance of Utilities

Regulations will be extensive and ABmunis will work collaboratively with Municipal Affairs and other municipal associations on the development of all future regulations. These regulations will further clarify the requirements that have been introduced in Bill 28 and may have additional impacts on municipalities.

Changes to the Municipal Government Act

Unless otherwise noted, the proposed changes to the *Municipal Government Act* will come into force upon Royal Assent.

Accountability – Councillor Accountability Framework

Proposed Change	ABmunis Analysis
<p>Councillor Accountability Framework Allows for the Minister to, by regulation, establish a universal councillor accountability framework for all municipalities across Alberta. <i>(Division 1.01, s. 146.011)</i></p>	<p>Support in Principle Bill 50, the <i>Municipal Affairs Statutes Amendment Act, 2025</i>, repealed provisions relating to municipal codes of conduct (s. 145(10)), as well as prohibiting any future bylaw or resolution related to the behaviour or conduct of councillors or council committees (s. 145(9)).</p> <p>Since the repeal of codes of conduct, ABmunis, along with other municipal associations and municipalities, has advocated for these codes to be reinstated to strengthen ethical, respectful, and accountable conduct for elected officials.</p> <p>Bill 28 outlines that any future accountability framework may include:</p> <ul style="list-style-type: none"> • Rules respecting pecuniary interest (subject to s. 170, 172, 173, and 174(1)(g) to (i)) • Rules respecting the use of municipal assets and services • Rules respecting the confidentiality of information • Rules respecting egregious behaviour, threatening behaviour, or improper use of influence • Rules respecting the conduct and terms of investigators or appeals commissioners • Rules respecting processes for a complaint, an investigation, a preliminary review, a decision to apply sanctions, and appeals • An investigator’s power • Rules respecting the publication of information • Rules respecting the contents of a pecuniary interest report • Custody and retention of records related to preliminary reviews, investigations, reports, and appeals • Permitted sanctions • Timelines for making a complaint, appeals, making an order and releasing findings, and reasons provided by an appeals commissioner or Minister • Setting fees for complaints and appeals <p>ABmunis understands that significant details related to the framework will need to be drafted as part of the regulation. We look forward to the opportunity to fully collaborate with the Ministry on regulations. We recognise that member engagement will be crucial to this process.</p>

	<p>Gap in Accountability for Public Members on Council Committees We note that Bill 28 does not apply to council committees, which we see as a significant gap. Changes in Bill 50 prohibited councils from passing bylaws or resolutions pertaining to the behaviour of councillors or other members of council committees who are not councillors. While council may govern and establish basic requirements for council committees, they still lack a mechanism to hold non-elected committee members accountable for their behaviour.</p> <p>Costs to Municipalities ABmunis continues to be concerned about the cumulative impact of costs on municipalities. We understand that under the new accountability framework, municipalities will be required to cover costs related to preliminary reviews and investigations while the Minister covers costs associated with appeals or Minister-initiated investigations. Regulations related to costs, including establishing fees for complaints, and standard fee structures for preliminary reviews and investigations, will be critical to ensure that the framework is not only accessible to municipalities, but also reduces unintended financial strain. For example, consideration could be given to establishing fees to file a complaint that could be reimbursed if the complaint is found to merit investigation but would be put towards covering costs if the preliminary review finds the complaint to be frivolous or vexatious. This is discussed in further detail in the section on “Preliminary Review.” Ongoing engagement with members will be required.</p>
<p>Complaints and Investigations If an accountability framework is established, the Minister must designate investigators for the purposes of investigating complaints received under the framework. (s. 146.02)</p> <p>A councillor is permitted to make a complaint against another councillor if they have reasonable grounds to believe there has been a contravention of the accountability framework. (s. 146.021)</p> <p>Upon receiving a complaint, a council will be required to appoint an investigator to conduct an investigation. (s. 146.03)</p>	<p>Support in Principle and Further Details Required</p> <p>Investigators ABmunis has advocated for an independent third-party ethics/integrity commissioner since the introduction of codes of conduct. Although Bill 28 does not formally establish an independent office, ABmunis supports the requirement for investigations to be completed by an independent third-party.</p> <p>ABmunis understands that the Minister must designate the individuals that the Minister considers qualified, “subject to any terms and conditions the Minister considers necessary.” Consequently, ABmunis looks forward to working with Municipal Affairs to establish the criteria related to investigator qualifications and finalize a roster of investigators available to municipalities.</p> <p>We understand some municipalities already have independent offices of integrity commissioners and in principle, those commissioners would be eligible to apply to be appointed as investigators of complaints.</p> <p>Complaints Bill 28 allows for a councillor to file a complaint if they have reasonable grounds to believe that another councillor on the same council has contravened the framework. Councillors can file a complaint on behalf of the public or administration. Bill 28 requires that a councillor filing a complaint does so in a form acceptable by council.</p>

	<p>ABmunis recommends that regulations establish a mechanism to file complaints that emerge as part of intermunicipal collaboration discussions.</p> <p>Although we understand that the framework provides the authority for council to create a “form” for receiving complaints, ABmunis also recommends establishing a form in the regulation to provide consistency across the province, rather than every municipality creating their own format via council policy.</p> <p>Further, the legislation doesn’t specify if a group of councillors could jointly file a complaint against another councillor to prevent multiple complaints on the same violation. Additional clarification is required and consideration should be given to the potential for a joint complaint.</p> <p>ABmunis notes that there appears to be a gap between how complaints are received and how investigation reports are shared with council. Bill 28 is unclear on whether complaints are submitted in closed session to protect confidentiality. It also does not clearly state whether a councillor named in a complaint can see the complaint before it is formally submitted or reviewed by council.</p> <p>Investigations</p> <p>Upon receiving a complaint, councils must appoint an investigator to investigate the complaint, and the municipality is responsible for the costs of the investigation. The legislation is unclear as to whether accepting a complaint and passing a resolution to appoint an investigator must be done at the same meeting or within a time period specified in the regulation.</p> <p>ABmunis understands that the province intends to establish regulations respecting fees associated with filing a complaint. We support development of a fee structure that balances attraction of qualified investigators with the need to control costs for municipalities.</p> <p>An investigator has the power to:</p> <ul style="list-style-type: none">• Make inquiries of any person they believe has or may have information relevant to the investigation• Demand the production of records or documents• Make copies of any documents or records• Access any municipal land or facilities• Do anything permitted in the accountability framework <p>However, the legislation does not set out the responsibilities of the municipality, its employees, the complainant, or the person subject to the complaint.</p> <p>Prior to an investigative report being submitted, if either the person who made the complaint or the person subject to the complaint is no longer a member of council, the investigation must end immediately. The investigator must inform the council and the Minister that the investigation has ended, as well as the reasons for the conclusion. ABmunis believes that unintended consequences</p>
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	<p>may result if an investigation ends because the complainant is no longer on council, but the councillor subject to the complaint remains. There are many reasons why a complainant may resign, and their resignation does not mean that the contravention was fully investigated with a resolution being identified, nor will it guarantee that a similar complaint will not arise in the future given the inability to formally conclude the investigation. There are also risks that a councillor subject to a complaint could resign to end an investigation and then run again for council at a later point. In addition, concluding an investigation without disclosure of findings does not provide transparency to the public or the remainder of council. At the same time, concluding an investigation with resignations does save the municipality from spending additional time and money on an investigation.</p> <p>The legislation also permits the Minister to appoint an investigator if they are of the opinion that a councillor may have contravened the accountability framework.</p> <p><i>Outstanding Questions on Complaints and Investigations</i></p> <ul style="list-style-type: none"> • Are municipalities required to establish a policy for the purposes of outlining the form in which a complaint is considered “acceptable by council”? If so, what is the timeline for councils to establish their policies after the implementation of any regulation? • Are municipalities permitted to establish a process for receiving complaints from the public that could then inform whether a councillor may wish to proceed with a complaint under the framework? • If a councillor resigns to end an investigation and then chooses to run in the by-election, is there a mechanism to ensure the investigation can continue or is a new complaint required if the person is re-elected to council? • Will the regulations include a mechanism to manage multiple complaints on the same issue or allow for multiple councillors to be named as complainants on the complaint? • Does council formally accept a complaint, if in the acceptable format, by resolution or is it submitted in closed session? Investigator reports are first submitted in closed session, but similar processes are unclear related to complaints. • Does the government intend to create a different mechanism for public or employee complaints that ensure accountability of elected officials? • Section 146.03 requires that council must appoint an investigator if it receives a complaint. What is the timeline for council to appoint an investigator after receiving the complaint?
<p>Preliminary Review An investigator is required to conduct a preliminary review prior to completing an investigation. (s. 146.05)</p>	<p>Support Prior to proceeding to an investigation, Bill 28 outlines that an investigator must complete a preliminary investigation to determine if a complaint is frivolous, vexatious, or outside of the scope of the accountability framework.</p> <p>ABmunis supports the concept of a preliminary review since municipalities will be responsible for the costs associated with an investigation. If it is determined a complaint is frivolous or vexatious or falls outside of the scope of the framework, municipalities will only be responsible for the costs of the preliminary review rather than the full investigation.</p>

	<p>We also support requiring the investigator to file a report of the findings with council, as it ensures transparency.</p> <p>ABmunis recommends that related regulations establish a clear definition of “frivolous” and “vexatious” to ensure that the same standard is applied by all investigators. This also ensures clarity for all elected officials who may use the accountability framework in the future.</p> <p>As mentioned in a previous section, ABmunis also recommends establishing a fee payable to the municipality for filing a complaint. The municipality would hold the fee until the preliminary review has concluded. If the review finds that the complaint was frivolous or vexatious or falls outside of the scope of the accountability framework, the municipality would retain the fee. If the review determines the complaint falls within the framework, the fee is refunded to the complainant. The intention is not to deter complaints but rather to recognize the costs that municipalities will be responsible for when a complaint is received and ensuring there is accountability for the person filing the complaint. To reflect differences among municipalities in Alberta, a minimum and maximum fee could be set, while allowing each municipality to choose a fee that fits its needs, as long as the fee does not exceed the maximum.</p>
<p>Decisions and Sanctions An investigator must prepare a report for council that summarizes the investigation, recommendations, and reasons for the recommendations. (s. 146.07)</p> <p>After receiving an investigation report, council must determine if the councillor has contravened the framework. (s. 146.08)</p>	<p>Support in Principle and Further Details Required An investigator must submit an investigation report that includes:</p> <ul style="list-style-type: none"> • A summary of the investigation • Recommendations on whether council should find that the councillor has contravened the framework • Reasons for the recommendations • Recommended sanctions, if any <p>This report ensures transparency and accountability of the framework and the investigative process. The report must be submitted to council via closed session and be made publicly available in accordance with the framework.</p> <p>After receiving a report, council must pass a resolution determining if the councillor has contravened the framework. If council determines that a contravention has occurred, the council must apply the sanctions recommended in the report; apply one or more different sanctions; or apply no sanctions. A councillor who is the subject of a complaint is not permitted to participate in discussions related to the report nor any resolution. They cannot vote on any resolution related to the report and must leave the room until the discussion and voting has finished.</p> <p>Sanctions will be determined through regulation, and it remains unclear what type of sanctions will be available to investigators and councils. ABmunis looks forward to future engagement during the development of the regulations.</p>

	<p>There continues to be a gap related to Occupational Health and Safety (OHS), specifically complaints filed against a councillor by reason of unsafe work environments. Although a complaint may be filed by administration due to action or behaviour of a councillor under OHS, the councillor cannot be individually sanctioned at the conclusion of an investigation. The municipality is responsible for any necessary remedies or sanctions. This approach continues to lack the necessary accountability when complaints related to OHS have been filed against elected officials.</p> <p>Outstanding Questions</p> <ul style="list-style-type: none"> • The investigation report must be submitted in a closed session and made publicly available in accordance with the regulations. However, council is required to make a resolution after receiving the report. Is the intention that the investigation report and council resolution be dealt with at separate meetings to ensure the report is publicly available to support transparency? • Further, requiring the councillor subject to the complaint to leave the meeting room implies that they cannot be present in closed session where the investigation report is submitted. Does this mean that the councillor subject to the complaint will not have access to the report until it has been made public? • Although there is a requirement for the councillor subject to the complaint to leave the room when discussion regarding the report or a resolution takes place, the same requirement doesn't exist for the person who has filed a complaint. Is the intention that the complainant is still permitted to participate in discussion even though a bias may exist, but the person subject to complaint must leave the room due to perceived bias? ABmunis supports requiring the councillor subject to the complaint to abstain from discussion and voting, but in the spirit of transparency, any person who is the subject of a complaint should be afforded the ability to hear discussion related to the complaint.
<p>Pecuniary Interest Report Requires an investigator to immediately stop an investigation and report to council if there are reasonable grounds to believe a councillor may be disqualified due to a pecuniary interest. (s. 146.06)</p>	<p>Support in Principle and Further Details Required</p> <p>ABmunis understands that the intention of including pecuniary interest in the accountability framework is to enable an independent investigator to verify whether or not pecuniary interest rules have been violated prior to filing a court application. This initial check-and-balance is helpful to council and ensures as much information is gathered and provided to council prior to incurring the costs of a court application.</p> <p>If a pecuniary interest has been found by the investigator, council will be required to file a court application for disqualification if the councillor chooses not to resign. In all other instances of disqualification, council may still choose to file an application with the courts. Filing court applications for disqualification can have serious financial implications for municipalities.</p> <p>Outstanding Questions</p> <ul style="list-style-type: none"> • Section 174 of the <i>Municipal Government Act</i> includes several additional violations outside of pecuniary interest that are subject to disqualification: most notably, instances where a councillor may have been ineligible or has ceased to be eligible for council under the <i>Local Authorities Election Act</i>. Why are investigations related to pecuniary interest the only instances

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	<p>of disqualification included in the accountability framework? We believe there would be cost savings for municipalities for all instances of potential disqualification to be investigated, given the financial impact of court applications.</p> <ul style="list-style-type: none"> Given council will be compelled to file a court application if a councillor chooses not to resign, will the regulation outline a timeframe for council to act?
<p>Appeals If an accountability framework is established, the Minister must designate commissioners for the purpose of hearing appeals. (s. 146.09)</p>	<p>Support and Further Details Required This amendment supports independent investigations and principles of procedural fairness by ensuring that a person who has made a complaint, or the person subject to a complaint, may appeal the council’s determination that there was or was not a violation of the accountability framework and/or the council’s decision to apply or not to apply a sanction. We expect the associated regulation to specify the timelines for appeals and the fees for filing an appeal.</p> <p>ABmunis understands that this appeal process does not prevent a complainant or person subject to a complaint from filing a further appeal to the Court of King’s Bench.</p> <p>Although ABmunis supports the appeal process, the drafted process requires the commissioner to recommend to the Minister whether to accept, reject, or vary the council’s determination and the sanctions (or lack thereof). The Minister must then determine if there has been a contravention and may choose to apply one or more sanctions. ABmunis appreciates that this provision may have been included in legislation given Municipal Affairs’ experience with select dysfunctional councils. At the same time, it limits municipal autonomy.</p> <p>ABmunis recommends that the Appeals Commissioner be required to file their report with both the Minister and the council for transparency.</p>
<p>Standard Meeting Procedures Intention to create standard meeting procedures through regulation that municipalities will be required to follow at minimum (not included in Bill 28).</p>	<p>Further Details Required Based on authority granted in Bill 50 (2025), ABmunis understands that the Minister of Municipal Affairs still intends to create a regulation or ministerial order outlining meeting procedures that set a minimum standard for all municipalities. We further understand that municipalities will be able to pass procedural bylaws that build on the standard procedures set by regulation. We also understand that the procedures are not expected to significantly impact municipalities.</p> <p>We will continue to engage with the Ministry on these procedures and look forward to future engagement on the regulation as it is developed.</p>

Governance of Viability Reviews

Proposed Change	ABmunis Analysis
Public Vote on Viability	Oppose

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The public vote from a viability review will be non-binding and the Minister will have discretion on what recommendation to make to Cabinet when considering whether a municipality should dissolve.
(s. 130.1(2) and 130.1(3))

Currently, when a viability review is complete and residents vote on whether the municipality should be dissolved, the Minister is bound by the results of the vote. For example, if residents vote to dissolve, the Minister must recommend to Cabinet that the municipality be dissolved.

The proposed amendment will make the public vote non-binding, giving the Minister discretion on what recommendation to make to Cabinet. While residents of municipalities retain the ability to express their views on the future of their communities, this proposed amendment fundamentally weakens both the power and credibility of their democratic voice.

ABmunis' members have raised questions about whether the current viability review process adequately informs residents prior to a vote on viability. There are examples of communities that have gone through viability review processes and voted to remain, only to run into challenges soon thereafter that results in a review that ends in dissolution. One of ABmunis' strategic initiatives for the year is to develop recommendations to enhance Municipal Measurement Indicators and the Viability Review process to better inform councils and residents of the factors impacting the municipalities finance and governance. We will engage members as we develop these recommendations. Currently, ABmunis does not have direction from members on whether the public vote should remain binding or if there is support for the Minister to have more authority based on their access to broader information.

Outstanding Questions:

- Under what circumstances would the Minister consider recommending Cabinet disregard the results of the public vote?

Municipal Transparency

Proposed Change	ABmunis Analysis
<p>Public Disclosure of Municipal Official Salaries Beginning in 2027, municipalities will be required to disclose the total compensation and severance for each employee who exceeds the threshold outlined in the <i>Public Sector Compensation Transparency Act</i>. (Part 6.1, s. 215.1-215.7)</p>	<p>Further details Required This proposed change was expected, as the Premier’s 2025 mandate letter directed the Minister of Municipal Affairs to “conduct a review of compensation and benefits for municipal officials to ensure taxpayer dollars are being respected and compensation levels are commensurate with time commitment and responsibility, including through the establishment of a salary disclosure”.</p> <p>Threshold for Reporting The proposed changes align with public disclosure in the Alberta public service, including the threshold established in the <i>Public Sector Compensation Transparency Act</i>. As of 2025, the threshold is \$133,813.</p> <p>Bill 23, the <i>Justice Statutes Amendment Act</i>, is currently being considered by the legislative assembly and proposes a base salary and severance threshold of \$130,000 for employees of the Government of Alberta, as well as employees of a public sector body, education body, or municipal authority. Bill 23 has not yet been passed by the assembly.</p> <p>Reporting Requirements and Audits While municipalities already report the compensation of the Chief Administrative Officer through the annual financial statements, this amendment proposes to require municipalities to publish a listing on the municipality’s website of all employees whose compensation exceeds the specified threshold. If no employee exceeds the threshold, the municipality must still publish that information and notify the Minister.</p> <p>The Minister has the authority to issue an order requiring an internal audit to ensure compliance, as well as requiring the results of the audit to be made public. If the Minister has ordered an audit, the municipality will be responsible for the costs that the Minister has incurred for the audit and publishing the results.</p> <p>Potential Impacts ABmunis is uncertain of the problem the proposed amendment is trying to solve, as well as its overall purpose. While some members have highlighted that the proposed amendment increases public transparency in relation to municipal finances and increases accountability, other members have identified that salaries in the municipal sector vary based on the size and location of communities, as well as the responsibility of the position, making it difficult for direct comparisons. There may be several unintended consequences of the amendment, including:</p> <ul style="list-style-type: none"> • Increased costs for municipalities due to salary disclosure being used as a bargaining tool by candidates and existing employees for increased compensation.

Proposed Change	ABmunis Analysis
	<ul style="list-style-type: none"> • Misaligning employers’ existing responsibilities to assess and mitigate psychosocial hazards due to obligations under Occupational Health and Safety, specifically in small and mid-size communities where identifiable disclosure introduces new and avoidable psychosocial risk. <ul style="list-style-type: none"> ○ Senior employees in small and mid-sized communities are more likely to have personal relationships within the community because of their regular interactions with residents or through presentations at public council meetings. ○ Disclosing compensation may open employees up to harassment and abuse both online and in-person through their daily activities including outside of work hours through their personal dealings in the community. ○ There is much less risk of that for provincial staff because they rarely present in public meetings and are less known in the broader public. • Public misperceptions based on how much someone earns versus the complexity of their role or performance. • Difficulty in recruitment and retention of staff that may disproportionately affect smaller and mid-sized municipalities, leading to further strain on those municipalities. • Potential negative impact on the culture and productivity of teams when employees learn what their colleagues earn, particularly if compensation levels differ significantly. <p>Unlike other orders of government, municipalities are already required to set their budgets, which include administration costs, in public. We will continue to gather feedback from members to inform our advocacy efforts on this topic.</p> <p>Members have identified that an option for disclosure that would maintain municipalities’ obligations to the health and safety of staff is to use position-based disclosure with compensation ranges rather than named individuals. In addition, it is imperative that clear criteria are adopted that recognize safety risks associated with community size. This approach balances greater transparency while also ensuring the safety of staff, specifically in small and mid-size municipalities.</p> <p>Members have also recommended establishing a single Government of Alberta platform to disclose compensation for all applicable public bodies, eliminating the requirement for individual municipal postings. This recommendation would promote the transparency of salary disclosure, while at the same time, ensuring that all disclosure is centralized to make it as easy as possible for Albertans to find information they are looking for rather than the information being captured in different formats on individual municipal websites.</p>
<p>Transparency of Policing Costs Allows municipalities to show the portion of the tax rates that are required to raise revenue to pay amounts owing under the <i>Police Act</i>. (s. 334(4)).</p>	<p>Support ABmunis supports this change to enable municipalities to proactively show the costs of policing under the <i>Police Act</i> on the tax notice. Municipalities are already empowered to show the total requisition required to be paid into the Alberta School Foundation Fund (education property taxes) under the <i>Education Act</i>.</p>

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Proposed Change	ABmunis Analysis
	<p>This change enhances transparency and clarity for the taxpayers in municipalities who are facing increased policing costs under the <i>Police Act</i>. Addressing policing costs will continue to be a priority for ABmunis for the foreseeable future.</p>
<p>Clarification of Reporting the Use of Natural Persons Powers Clarifies when notice must be provided to council as it relates the use of municipality’s natural person powers. (s. 208)</p>	<p>Support in Principle Bill 50, the <i>Municipal Affairs Statutes Amendment Act, 2025</i>, introduced the requirement for the CAO to notify council in writing when exercising the use of natural persons powers. ABmunis noted at the time that this provision would add significant burden to municipal administrations.</p> <p>Bill 28 clarifies that reporting is not required when the use of natural persons powers is related to:</p> <ul style="list-style-type: none"> • A matter that has been approved by bylaw or resolution of council • A personnel matter • A routine operational matter • An emergency response • Seeking a legal opinion on behalf of the municipality. <p>Although the CAO will still be required to report the use of natural persons powers within 14 days of their use, the additional clarity of when reporting is not required will significantly reduce reporting and the strain on administration.</p> <p>While we are pleased that Bill 28 brings greater clarity to provisions introduced in Bill 50, we still question the need for this provision in the first place.</p>
<p>Clarification of Councillor Access to Information Clarifies when the CAO must fulfill information requests and enables municipalities to pass a bylaw defining “substantial information.” (s. 208.1)</p>	<p>Support in Principle ABmunis is pleased to see that Bill 28 includes clarification related to councillor information requests, given the concerns we raised following the introduction of Bill 50.</p> <p>The proposed amendment clarifies that when information has been provided to a councillor in response to an information request, and the information is publicly available, the CAO may provide the information to all other councillors but is not required to. Further, a council may pass a bylaw outlining “substantial information requests” and may identify when a resolution is required before the CAO complies with the request, as well as any reporting requirements by the CAO in the case of substantial information requests.</p> <p>The provisions in Bill 28 recognize that requests for substantial information can mean different things for different municipalities based on their size and administrative capacity. Enabling bylaw-making authority recognizes municipal autonomy and ensures that the decision relating to information requests rests with individual municipalities, rather than a one-size-fits-all approach.</p>
<p>Modernizing Business Improvement Area (BIA) Governance Creates greater flexibility related to BIA governance. (s. 53)</p>	<p>Support ABmunis participated in consultations on this topic throughout 2025. Consensus was not reached during the engagement on significant changes to BIAs. The proposed changes are minor and consistent with ABmunis’ recommendations to the province.</p>

Enabling Growth and Housing

Proposed Change	ABmunis Analysis
<p>Automatic Yes and Automated Technology Clarifies that a municipality may authorize the use of an automated system for making decisions on applications for development permits and issuing development permits. (s.640.2(c.1) and s.694)</p>	<p>Support and Further details required Use of automated technology for the purpose of making decisions on applications for development permits is consistent with current practices in some large municipalities.</p> <p>ABmunis understands that the province intends to establish regulations outlining requirements for automatic approvals of certain development permits. Initial conversations indicate the intention is to focus on low-risk permits, such as fences and decks. If this is what emerges from the regulatory development process, it will be consistent with feedback heard during the Enabling Growth and Housing Affordability Consultations held in 2025.</p>
<p>Development Permit Statistics Municipalities greater than 15,000 will be required to publicly report development permit activity and timelines. (s 683.2)</p>	<p>Further Details Required ABmunis broadly supports efforts to enhance transparency and notes that many municipalities are already proactively reporting some of the newly required statistics. Municipalities greater than 15,000 will be required to report no later than March 31 of every year:</p> <ul style="list-style-type: none"> • The total number of applications for development permits that were received • The total number of development permits issued • The average and median number of days from when the application for a development permit was received to when the application is complete or refused • The average and median number of days from when an application was complete to when the development permit was issued or refused • A comparison between the averages to the required timelines in the MGA <p>While transparency is important, this legal requirement is a new layer of red tape which will add to the total of cost increases imposed upon municipalities.</p>
<p>Off-Site Levies (OSLs) Clarifies costs that may be included in off-site levy charges and expands exemptions for charter and independent schools. (s. 648(a) 1.2 and s. 648(b) 2.11)</p>	<p>Oppose Presently, the MGA itemizes what an OSL may be used for. The amendments seek to also itemize items that are explicitly exempt from OSLs, including:</p> <ul style="list-style-type: none"> • Operational costs • Capital costs relating to commercial retail facilities included in the design of a facility referred to in s. 648(2) and (2.1) that are not related to the delivery of core services • Anything not permanently affixed to a facility (such as vehicles and furniture) • Capital costs incurred to build to a standard higher than the standard required under building codes

Proposed Change	ABmunis Analysis
	<p>The proposed changes limit municipal autonomy and the ability for municipalities to cover certain costs through OSLs under the principle of “growth paying for growth”. Any limits to the ability of municipalities to raise revenue to cover costs is concerning, especially during a time of increasing pressure on the property tax base. For example, as outlined in our Property Taxes Reimagined project, the cost of purchasing a new fire truck to reach newly developed areas has increased by about 70 per cent over the last five years. We also note that “core services” is not clearly defined.</p> <p>In addition, the provision excluding OSLs from covering capital costs beyond building codes limits the ability of municipalities to respond to local circumstances, e.g. ensuring infrastructure is resilient to extreme weather risks.</p> <p>Bill 28 also expands exemptions from schools owned by or leased to a school board to now include Charter and Independent schools. ABmunis notes that exempting privately operated schools from OSLs shifts the costs of development onto other residential and commercial development and could be complex to implement where there are multiple uses of one site.</p>
<p>Non-Statutory Studies Intention to create future regulations to streamline development approvals (not included in Bill 28).</p>	<p>Concerns - Further Details Required The legislation related to non-statutory studies is vague and lacks clarity, limiting ABmunis analysis. The Bill 28 Information Guide released by Municipal Affairs commits to a future regulation that will build on the amendments proposed for offsite levies by examining the role of non-statutory studies in the development process to further streamline approvals. More details are required to understand how the province intends to limit the use of non-statutory studies. Municipalities can already adjust study requirements if information is not needed or relevant to applications. It is important to know that these studies often serve as essential risk-management tools for municipalities. By removing these tools, it limits municipalities’ in making informed decisions and mitigating risks. Over time, these limitations can lead to higher infrastructure costs, public safety concerns, and increased municipal liability.</p> <p>ABmunis will remain engaged with Municipal Affairs to better understand the intention of a future regulation. We expect to participate in future engagements on this topic.</p>
<p>Reserve Land for Charter Schools Charter schools accredited by the Ministry of Education and Childcare would be allowed to access municipal and school reserve land. (s.616 (a) and 648(a) 1.2)</p>	<p>Concerns - Further Details Required Bill 28 proposes to amend the MGA to expand the types of schools that can access reserve land. ABmunis understands that while this change makes reserve lands available to Charter and Independent schools, it does not change the land allocation process. We understand the intention is to treat Charter and Independent schools the same as public schools. Members have also identified challenges with the process and costs associated with siting and servicing of new schools in addition to school site ownership. Members have questions about concerns about how the proposed changes will impact Joint Use Planning Agreements (JUPAs) and may further exacerbate existing challenges coordinating and covering the costs of school site development, including whether the existing 10 per cent municipal reserve land dedication will be adequate to support public and charter schools. ABmunis remains committed to working with the Ministries of Municipal Affairs, Education, and Infrastructure to bring forward member concerns and seek solutions.</p>

Proposed Change	ABmunis Analysis
<p>Community Design Codes Intends to establish Minister’s authority to create design codes via regulation. (s.640.3)</p>	<p>Concerns - Further Details Required The proposed introduction of provincially-established Community Design Codes represents a significant shift of land use planning authority from municipalities to the province. While ABmunis appreciates the province’s desire to help communities remain attractive, competitive, and reflective of a unique sense of place, the ability of this code to override municipal statutory plans and land use bylaws, along with Ministerial authority to require municipalities to adopt design codes, raises concerns about municipal autonomy, local context, and community-driven planning outcomes. Many communities already struggle to attract development, and adding another provincial layer of requirements could further deter investment or slow projects in areas that can least afford additional barriers. Further details are required on how the design codes would be developed, applied, and tailored to reflect diverse municipal needs before the impacts on local planning authority, economic development, and governance can be fully assessed.</p> <p>ABmunis understands there are no current plans for the Minister to impose a community design code on municipalities, but notes an inconsistency between the stated intention and what has been drafted in Bill 28. Clarity is required to fully understand the future of the regulation, including any voluntary acceptance by municipalities. ABmunis is committed to remaining fully engaged with the Municipal Affairs during the future development of the design code regulation.</p>

Assessment & Property Taxation

Proposed Change	ABmunis Analysis
<p>Vacancy Property Tax If a council creates a residential assessment sub-class for property that is not a primary residence, that sub-class may not be assigned to a residential property that is wholly or partially owned by one or more individuals that reside in Alberta. (s. 297(2.01))</p>	<p>Oppose This proposed change was expected as the Premier’s 2025 mandate letter directed the Minister of Municipal Affairs to “protect Albertans from specialized municipal taxes directed at homes that are not a primary residence”. The amendment only applies to situations where municipalities create a sub-class(es) under the Class 1 Residential assessment class. Therefore, if your municipality does not have sub-classes for residential property, there is no impact on your municipality.</p> <p>This amendment, if passed, is deemed to have come into force on January 1, 2026.</p> <p>Application for Personally Owned Residences The amendment still enables a municipality to charge a different property tax rate on vacation or rental homes, but it may only be applied to properties that are wholly owned by persons who live outside Alberta. If there are multiple owners of a property and at least one of the owners resides in Alberta, then the municipality is prohibited from assigning it a residential sub-class that is specific to not being a primary residence.</p>

Application for Residential Property Owned by a Corporation

The amendment only applies to properties owned by individuals. Therefore, if a corporation owns a vacation or rental home, the municipality is permitted to assign it a separate assessment class and levy a different tax rate.

Call to Action if Using Residential Sub-Classes

Municipalities who currently use assessment sub-classes for different types of residential property should ensure that their tax rate bylaw clearly defines what types of property are subject to that sub-class(es). Without sufficient definitions in your tax rate bylaw, your municipality may unintentionally be subject to the new requirements of section 297(2.01) related to residential property that is not a primary residence. Common examples may be where municipalities have sub-classes for vacant residential land or multi-family residential property.

If your municipality has an assessment sub-class that triggers the proposed section 297(2.01), you will have 45 days after Bill 28 comes into force to either amend your bylaw or correct the assessment roll and reissue assessment notices for those properties for the 2026 taxation year. This is detailed in the proposed section 297.1 in Bill 28.

ABmunis opposes limits to municipal autonomy to develop solutions tailored to local contexts. Municipalities across Alberta have unique challenges, including with affordable housing, that require flexible solutions. Given constraints on both municipal and provincial finances, we have questions as to how the province will work with municipalities to ensure much needed affordable housing will be built.

ABmunis' Recommended Amendments

Assuming the legislative assembly is committed to passing this provision, ABmunis is recommending two amendments:

- Strike the words “current or ” from section 297(2.02)(a) in referring to the current year because it is not possible for a municipality to determine if a person has lived in Alberta for 183 days in the current year when the assessment roll must be produced by February 28 and it would be too administratively burdensome to be updating the assessment roll and reissuing tax notices for properties that sell during the year,
- Strike section 297(2.02)(b) “Does not have an intention of taking up residence outside Alberta” because it would be difficult for a municipality to verify a person’s intention of primary residence for the upcoming year when producing the assessment roll.

While details are limited, ABmunis assumes that these provisions were included to provide flexibility to change the assessment sub-class and tax rate for properties that sell during the year where the new owner has a different residency status from the previous owner. However, ABmunis recommends that the assessment classification be determined only on the residency status of the owner in the previous calendar year and if the property sells in the current calendar year, the change in property tax may be a condition of the negotiated purchase agreement between the buyer and seller.

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<p>Equity in Assessment of Industrial Property New clause clarifies that the assessment of a designated industrial property or machinery and equipment property is deemed equitable if the assessor has applied the standards and procedures set out in the regulations. (s. 293(1.1))</p>	<p>Support in Principle Some industrial property owners have appealed their assessments on the basis that one property’s valuation differs from industrial properties that they consider comparable. The proposed clause is intended to clarify that comparable properties do not have to have similar assessment valuations as long as the regulations have been followed consistently. The differentiation in valuations of comparable industrial properties is a product of Alberta’s regulated assessment approach for industrial property, which is different from the market value approach used for residential and commercial property.</p> <p>ABmunis supports the amendment to provide clarity in Alberta’s assessment system and ideally reduce assessment appeal costs for municipalities.</p>
<p>Regulations for Designated Industrial Property New provisions added to enable the Minister to make regulations related to designated industrial property and machinery and equipment. (s. 322(1))</p>	<p>Support in Principle and Concerns - Further Details Required This amendment relates to Municipal Affairs’ current multi-year review of how industrial property is assessed. Historically, the Minister published a Construction Cost Reporting Guide that defines how some Designated Industrial Property and machinery and equipment are assessed. These amendments will enable the Minister to set these rules through standard regulations instead of a guide.</p> <p>ABmunis’ supports the province’s intent to bring clarity to the assessment system through new regulations, as the existing system has not been updated since 2005. The current lack of clarity has led to significant legal costs for municipalities when managing costly appeals related to the assessment of Designated Industrial Property and machinery and equipment.</p> <p>However, ABmunis has concerns with some of the broader policy changes that will be formalized through these new regulations. The policy changes were announced by the Minister of Municipal Affairs via letter to municipalities on April 1, 2026. ABmunis concerns will be shared with members through our The Weekly newsletter.</p>
<p>Penalty for Non-Reporting Enables the Minister to charge a penalty if a property owner does not provide the information requested by the provincial assessor within 60 days of the request. (s. 295(1.1))</p>	<p>Support Under the regulated assessment system for designated industrial property, the provincial assessor requires annual reporting of information by property owners, but some property owners fail to report or do not report on time, which prevents assessors from developing accurate assessments. The regulations are expected to prescribe penalties of up to \$10,000 for non-reporting. ABmunis supports the amendment to increase accountability in the regulated assessment system.</p>
<p>Dismissal of Complaint Due to Non-Reporting Adds a requirement for the Land and Property Rights Tribunal to dismiss an assessment complaint if the property owner did not provide the information requested by the assessor within 60 days of the request. (s. 499(2) and 295(4))</p>	<p>Support This amendment is intended to strengthen accountability by property owners to report information to the assessor when requested so that assessors have increased clarity when determining an assessment. The Land and Property Rights Tribunal hears all assessment complaints on Designated Industrial Property, which often require annual reporting by the property owner. This amendment will therefore incentivise owners to report on time so that they maintain the option to lodge an appeal.</p>

Public Institutions & Utilities

Proposed Change	ABmunis Analysis
<p>Governance of Utilities Enable Cabinet to transfer ownership of a municipal public utility to a public utility entity (e.g. a controlled corporation or regional commission). Details will be subject to the development of regulations. (s. 44.1).</p>	<p>Oppose The intent of this amendment is not clear, but ABmunis assumes that the province wants legal authority to take action to change the governance of a public utility (water and wastewater services) in situations where a municipality is not managing the utility to what the province deems a reasonable standard. Our preliminary concern is the potential override of local autonomy. We have concerns about using legislation to address isolated issues.</p> <p>Outstanding Questions</p> <ul style="list-style-type: none"> • What situations will necessitate the province exercising this authority? • Will the regulations define a framework of criteria that must be triggered before the province transfers ownership of a public utility?

Aggregate Pits (Environment and Protected Areas)

Proposed Change	ABmunis Analysis
<p>Aggregate Pits Clarifies how municipal land-use decisions interact with provincially approved aggregate pit registrations under the <i>Environmental Protection and Enhancement Act</i> and requires municipalities to approve a development permit where the registration has been approved by the province. (s. 619.1)</p>	<p>Oppose The proposed changes will give aggregate pit registrations under the <i>Environmental Protection and Enhancement Act</i> precedence over municipal statutory plans, land use bylaws, subdivision decisions, and development approvals. Municipalities will be obligated to approve a pit application when it aligns with the registration filed under the <i>Environment Protection and Enhancement Act</i> within prescribed timelines, with limited ability to impose local conditions or hold hearings.</p> <p>While ABmunis understands the intent to provide regulatory clarity and certainty for aggregate resource development, these changes raise concerns about the erosion of municipal land use authority, reduced local decision making, and restricted opportunities for community input. Additional details are needed to understand how municipal planning objectives, infrastructure impacts, and community considerations will be incorporated into the provincial registration process.</p> <p>Proposed amendments would come into effect upon proclamation.</p>

Changes to the Alberta Housing Act

The proposed changes to the *Alberta Housing Act* will come into force on January 1, 2027.

Seniors Lodge Program (Assisted Living & Social Services)

Proposed Change	ABmunis Analysis
<p>Seniors Lodge Program The <i>Alberta Housing Act</i> will be amended to address the long-term sustainability of seniors' lodge housing. These changes would establish requirements for capital maintenance reserve funds for lodge assets; allow capital reserve contributions to be requisitioned from municipalities where appropriate; and strengthen governance practices for Housing Management Body boards. (<i>Alberta Housing Act</i> s. 1, 4, 5, 7, 8, 33, and 34; Schedule 1)</p>	<p>Concerns - Further details required Requisitioning for Capital Reserves This amendment clarifies that housing management bodies may requisition funds for capital reserves that support new or replacement lodge accommodations, with the agreement of member municipalities. ABmunis understands that some municipalities already allow this through local agreements. Keeping this authority voluntary allows municipalities to assess, case by case, whether this approach fits their local circumstances. Further, the legislation appears to respect municipalities' ability to pay by outlining that requisitions be shared based upon equalized assessment. This appears to resolve any conflicts about requisition amounts amongst member municipalities, as well as smaller municipalities who might have limited funds to contribute.</p> <p>Mandatory Capital Maintenance Reserve Funds The requirement for mandatory capital maintenance reserve funds reflects a recommendation of the Seniors Lodge Review Panel, which included municipal representation. However, concerns remain about the financial impact on property taxes. Housing management bodies can already requisition municipalities to cover operating deficits and to establish or maintain reserve funds. Making reserve funds mandatory could increase and accelerate financial pressure on municipal budgets. While this change supports better maintenance of lodge assets, it adds to the cumulative strain on the property tax base, particularly given the Panel's related recommendation that the province retain responsibility for major capital projects and new lodge development unless otherwise agreed. ABmunis will seek further details from the Ministry as to the potential impact on municipalities where there are no existing or low reserve funds.</p> <p>Ongoing changes to housing management body governance through ministerial order have limited the number of council-appointed members of the management body, effectively limiting the municipal voice at the same time as these mandatory reserve fund changes are increasing financial demands on the property tax base. Bill 28 does not reflect the broader recommendation of the Seniors Lodge Review panel report to revisit the funding model between the province and municipalities.</p> <p>Ministerial Authority over Reserve Fund Types Clarifying the types of reserve funds the Minister may regulate appears to formalize the reserve fund categories that already exist in practice. However, additional information is needed on the intent and scope of these amendments. ABmunis will engage with the province as the regulations are developed.</p>

Preliminary Analysis of Bill 28: Municipal Affairs and Housing Statutes Amendment Act, 2026

Proposed Change	ABmunis Analysis
	<p>Lodge Rate Regulation</p> <p>Moving the lodge rate from legislation to regulation does not, on its own, raise concerns. However, understanding the intent behind this change will be essential to advising municipalities on potential impacts to municipal finances and to vulnerable residents.</p>

Changes to the Libraries Act

The proposed changes to the *Libraries Act* will come into force upon Royal Assent.

ABmunis is aware that the Coalition of Alberta Public Libraries (CAP Libraries) issued a [statement](#) on April 9, 2026, related to the proposed changes in Bill 28. The CAP Libraries represent all 324 public library service points across Alberta, serving 99 per cent of Albertans. The CAP Libraries have outlined the following broad themes of concern with Bill 28:

- Privacy and access
- Local decision-making
- Costs and practicality
- Scope and proportionality

Proposed Change	ABmunis Analysis
<p>Inspections Enables the Minister to appoint inspectors to conduct inspections for any matter relating to the management, administration, or operation of the public library, and to determine if a board is complying with the Act and Regulations. (s. 39)</p>	<p>Oppose The proposed change expands provisions related to inspections to include the ability to conduct an inspection into any matter relating to the management, administration, or operation of a public library. Inspections may also be used to determine if a board is complying with the <i>Libraries Act</i> and its regulations.</p> <p>Inspectors are permitted to:</p> <ul style="list-style-type: none"> • Inspect the public library property • Inspect the provisions of the services • Examine and make copies of records • Require an employee of the library board to reply to a question or provide any information requested by the inspector <p>Following an inspection, the inspector is required to make a report to the Minister and provide a copy of the report to the board. The Minister is provided with the flexibility to make any order they consider appropriate upon receiving the inspectors' report. Inspections are already permitted under the <i>Libraries Act</i>. However, the amendments expand the authority of inspections and provide further detail on the process, as well as the Minister's authority following an inspection.</p>
<p>Regulations Adds regulation-making authority respecting the access to and the use and borrowing of public library property by members of the public. (s. 40)</p>	<p>Oppose Bill 28 proposes allowing the Minister to make regulations regarding the access to and the use and borrowing of public library property by members of the public, including regulations restricting access, use, and borrowing based on age.</p> <p>The Minister also has authority to issue guidelines respecting a regulation as noted above. If guidelines are issued, the Minister is required to make them publicly available in a manner they consider appropriate.</p>

Preliminary Analysis of Bill 28: Municipal Affairs and Housing Statutes Amendment Act, 2026

Proposed Change	ABmunis Analysis
	ABmunis does not have full details regarding potential regulations. However, many libraries are funded by their local municipalities. The additional regulatory authority of the Minister may lead to further financial implications for municipalities if renovations, retrofitting, and/or additional staffing is required to align with the regulations.



Alberta Municipalities

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Subject: Bill 28 briefing note to member municipalities

Hello all:

Attached is a communication from the Coalition for Alberta Public Libraries (CAP Libraries). We ask that you please read and discuss in your council meetings from an advocacy standpoint for libraries in Alberta.

Additional communication is also being sent to all member libraries to also use in advocating for consultation with regard to the proposed changes.

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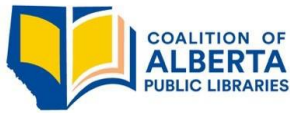
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Briefing Note: Bill 28 and Alberta's Public Libraries

Purpose

To inform Peace Library System Member Municipalities about the impacts of Bill 28 on public libraries, local governance, families, and staff, and to outline why municipal leadership matters.

Background

The Coalition of Alberta Public Libraries (CAP Libraries) represents 324 public library service points across Alberta, serving 99 per cent of Albertans. Public libraries are trusted, community led institutions governed locally by publicly appointed library boards and guided by professional standards.

Bill 28 introduces province-wide restrictions on access to public library materials and expands provincial authority into decisions traditionally governed locally.

Restricting access to library materials constitutes censorship, regardless of whether items remain physically present in library buildings.

Role of Public Libraries and Families

Alberta's public libraries exist to serve the whole community. They provide welcoming spaces and resources for families, guided by long-standing principles of intellectual freedom, equitable access to information, and responsive community service.

Public libraries already ensure that children have access to developmentally appropriate materials, while recognizing that **parents and guardians remain the primary decision-makers** about what their children borrow and how they use library services.

Public libraries support parental judgment and responsibilities. Unlike schools, public libraries do not replace parents' or guardians' role in guiding their children's library use

Libraries support families through established practices, including:

- Organizing collections by age and subject
- Providing shared account access so families can review borrowing activity
- Offering staff assistance to locate age-appropriate materials
- Training staff to address concerns respectfully and thoughtfully

Governance and Operational Concerns

Bill 28 undermines local library governance by shifting authority away from locally appointed library boards and trained library professionals.

CAP Libraries has been engaged with the Government of Alberta since Fall 2025 on issues related to intellectual freedom. Despite repeated requests for consultation, the public library sector was not included in discussions on the changes introduced through Bill 28.

CAP Libraries proposed practical, workable alternatives that would address concerns while preserving parental responsibility and local governance. These options were shared directly with the Premier and Minister and were not considered.

The province has indicated that key definitions and requirements will be determined later through regulation and ministerial guidance. Introducing access restrictions without clear definitions, processes, or implementation frameworks creates:

- confusion and inconsistency across communities
- operational challenges in shared public spaces
- inappropriate gatekeeping expectations placed on library staff in open, shared public space

Why This Matters to Municipalities

Municipalities appoint library boards and are responsible for local governance.

Public libraries are essential community infrastructure supporting learning, literacy, digital access, and social connection.

Provincewide rules that override local library governance undermine municipal authority and accountability.

What CAP Libraries Is Asking For

CAP Libraries is calling on the Government of Alberta to:

- Halt further action on Bill 28 implementation
- Engage in meaningful consultation with public libraries and municipalities
- Respect local library governance and professional decision-making
- Ensure any approach is clear, practical, and workable in real public library spaces

Core framing

- Public libraries are governed locally through municipal library boards.
- Libraries already support families and parental choice, and unlike schools, do not replace parents' or guardians' role in guiding their children's library use.
- Bill 28 undermines local authority and would place public library staff in difficult and inappropriate gatekeeping roles.
- Despite sustained efforts to engage with the Province since Fall 2025, public libraries and library boards were not consulted on changes introduced through Bill 28
- CAP Libraries proposed practical, workable alternatives to address concerns while preserving parental responsibility and local governance. These options were shared directly with the Premier and Minister and were not considered.

What we're asking municipalities to do

- Publicly affirm the authority of locally appointed library boards.
- Call for meaningful consultation with public libraries and municipalities before any regulations or ministerial guidance move forward.
- Write to the Minister of Municipal Affairs and the Premier expressing concern about restrictions on access to library materials and provincial overreach into local governance.
- Consider a council motion or resolution supporting intellectual freedom, local governance, and municipal authority over public library services.
- Share publicly available information from CAP Libraries to support accurate public understanding of how public libraries operate and why local governance matters

Suggested municipal letter language

Public libraries are essential community institutions governed locally by appointed library boards. They support families and respect parental decision-making, and unlike schools do not replace parents' role in guiding their children's library use. Bill 28 restricts access to library materials and undermines local governance. We urge the province to pause further action and engage meaningfully with public libraries before proceeding.