

June 12, 2026

The Honourable Joseph Schow  
Minister of Jobs, Economy, Trade and Immigration  
Government of Alberta  
10800 97 Ave  
Edmonton, Alberta

Re: Bill 26 – Immigration Oversight Act

Dear Minister Schow:

The Alberta Hotel & Lodging Association (AHLA) represents nearly 700 hotels across the province, accounting for more than 80% of Alberta’s hotel guest rooms. While many operate under internationally recognized brands, most are small- to medium-sized businesses that are locally owned and operated by Albertans. Hotels are essential economic infrastructure in Alberta. Beyond driving the visitor economy, they:

- Support key industries such as oil and gas, agriculture, construction, retail, and services.
- Accommodate workers and host sports teams, events, and group travel.
- Contribute to local communities through charitable and civic initiatives.
- Provide critical emergency shelter for evacuees and first responders during crises.

AHLA appreciates the opportunity to participate in consultations on Bill 26. To inform our input, we sought feedback from a variety of hotels around Alberta, as well as our Human Resources Advisory Council. The AHLA and our members broadly support stronger protections and improved oversight, particularly where it targets bad actors and unethical recruitment practices. **However, we are concerned about the time, effort, and cost that the Immigration Oversight Act will mean for reputable employers if the Regulation does not consider existing evidence of compliance.**

#### **Foreign Workers – An Essential Part of the Tourism & Hospitality Workforce**

Hotels remain committed to hiring Albertans first and continue to invest in domestic recruitment, training, and retention, including through partnerships with [Careers: Next Generation](#) and [Tourism HR Canada](#). Even so, members consistently told us that access to foreign labour remains essential to workforce stability. These workers help fill seasonal, operational, and hard-to-fill roles that cannot be reliably filled through local recruitment alone, especially in rural, remote, resort, and seasonal markets.

Members indicated that delays or restrictions on access to foreign labour would have immediate operational consequences, including:

- Reduced service levels and delayed room availability.
- Higher overtime costs and scheduling challenges.
- Employee burnout and increased turnover.
- Pressure on guest service, revenue, and workforce stability, especially during peak and shoulder seasons.
- Negative guest experiences.

For many hotels, foreign workers are not a short-term fix but part of a long-term workforce strategy. Members emphasized that retaining experienced international employees already working in Alberta is just as important as access to new workers. Delays or uncertainty that disrupt permit renewals or continued employment can force trained employees out of the province and require employers to restart recruitment for the same roles, disrupting service continuity, productivity, and workforce stability.

At the same time, members cautioned that a provincial employer registration and compliance regime under Bill 26 could duplicate federal requirements, lengthen hiring timelines, increase administration and compliance costs, and create uncertainty about jurisdiction. Several also warned that if the process becomes too complex, expensive, or slow, it may create more opportunity for unregulated recruiters, consultants, and other bad actors to exploit workers while legitimate employers bear the administrative burden.

### **Foreign Worker Recruiters & Immigration Consultants**

AHLA supports increased rigor and enforcement of recruiters and consultants. This protects both foreign nationals and employers who hire and trust these third parties, preventing exploitation, and strengthening confidence in the immigration system.

### **Demonstrating Compliance**

Alberta hotels have taken proactive steps to strengthen employer practices and compliance. With support from JETI's Workforce Partnerships Grant, AHLA developed the [\*Elevate Hotel HR and Safety Program\*](#), which provides hotels with training, resources, and support to ensure they comply with provincial legislation. AHLA worked closely with the departments of Jobs, Economy, Trade, and Immigration and Justice to inform the Employer Assessment. Since the program's launch in October 2025, over 50 hotels representing 8,390 of guest rooms in Alberta are progressing through the program, with more coming on every week. This reflects the sector's commitment to accountability, continuous improvement, and safe and fair workplaces. The AHLA is already looking at how to ensure compliance with the *Immigration Oversight Act* would be evaluated through this Employer Assessment.

### **An Effective System that Supports Economic Growth**

In light of this feedback, AHLA recommends that regulations under Bill 26 protect workers while minimizing unnecessary impacts on operations and workforce stability. We respectfully recommend that government:

- Align provincial requirements with federal processes to avoid red tape and unnecessary delays.
- Use AHLA's *Elevate HR and Safety Program* and Approved Employer framework to help identify hotels with a strong record of compliance and recognized industry standards, allowing government to focus enforcement where it is most needed.
- Provide clear timelines, plain-language guidance, training, and support contacts.
- Ensure the Immigration Oversight Act and Regulation are applied and enforced consistently amongst all industries.
- Target recruiters, consultants, and employers who exploit workers, while recognizing good-faith efforts to comply. Special effort should be made to identify those who may be employing foreign nationals on a contract basis, or under the table, such as those who operate short-term rentals or ghost kitchens.
- Phase in changes gradually and protect current workers and existing permits during the transition.
- Request that the [Government of Canada extend Alberta access to temporary rural employer measures under the Temporary Foreign Worker Program](#) so eligible employers outside census metropolitan areas can retain their current share of low-wage temporary foreign workers and access the temporary 15% cap.

### **Supporting Higher Ground: Alberta's Tourism Strategy**

The AHLA's recommendations align with the Government's [Tourism Strategy Pillar 3: People & Careers](#), which calls for policies that address immediate and long-term labour challenges and help communities retain and attract residents. The creation of Alberta's Tourism and Hospitality Stream, along with industry-led training and apprenticeship pathways, reinforces the need for practical immigration supports and long-term workforce development. Further, to achieve the government's goal of doubling tourism revenues by 2035, hotels will need continued access to international labour to support growth, maintain service levels, and meet visitor demand across the province.

Alberta hotels support protecting workers and strengthening the integrity of the immigration system. We believe the most effective framework under Bill 26 will be practical, coordinated, and responsive to the labour realities facing Alberta's hotel sector. This would allow government to meet its policy objectives while minimizing unintended impacts on operations, service delivery, and workforce stability.

We welcome the opportunity to discuss this further and look forward to your response.

Yours truly,



Tracy Douglas  
President & CEO  
Alberta Hotel & Lodging Association

cc: Honourable Andrew Boitchenko, Minister of Tourism and Sport  
Honourable Dale Nally, Minister of Service Alberta & Red Tape Reduction  
Mr. Darren Reeder, CEO Tourism Industry Association of Alberta  
Ms. Cheryl Muir, Vice President, Western Canada, Restaurants Canada  
Ms. Mona Pinder, Executive Director, Alberta Hospitality Association