

March 30, 2021

Attention:

J.D. Crookshanks
c/o condoreview@gov.ab.ca,
ConsumerProtectionAlberta@gov.ab.ca

Honourable Minister Nate Glubish
c/o ministersa@gov.ab.ca

The Honourable Nate Glubish
Minister of Service Alberta
103 Legislature Building
10800 - 97 Avenue NW
Edmonton, AB Canada T5K 2B6

Dear Minister Glubish,

Please accept this letter on behalf of the Association of Condominium Managers of Alberta (ACMA) regarding Service Alberta and the Alberta Governments consideration to the future and privatization of public land titles information in Alberta. As advocates for thousands of condominiums and many real estate industry members in Alberta, ACMA understands the profound and negative effects privatization would have for individual condo owners and our industry members.

Service Alberta has argued in the past, that the efficiency and modernization of these systems must be addressed. However, there has been no evidence that the privatization of Alberta Land Titles would benefit the public, the provincial budget or the many industries that access publicly controlled land titles data. Since the birth of this initiative, over a decade ago, numerous reviews of the pros and cons of privatization have been debated and these debates time and time again have failed to demonstrate that there is any issue with the system remaining under the current public model.

The necessary modernization specified in earlier system reviews has nearly been completed. The balance of this modernization can be achieved through nominal service fee increases, allowing Alberta Land Titles to continue to generate millions of dollars in NET revenue annually. Modernization is achievable while maintaining service costs that will not be prohibitive to Albertans accessing public information records.

Conversely, the privatization of Alberta Land Titles would negatively affect the interests of the Alberta public which includes the following:

- Substantial annual costs to condominium corporations, borne by the owners of these properties who are often under existing financial strain;
- Increased cost of titles and other registrations for all those involved in the sale, purchase and development of real estate in Alberta;
- Weakening of the Torrens land title system and erosion of land titles protections;

- Potential exposure of a publicly funded assurance fund to liability for increased title disputes (or exposure of individuals to risk through the dissolution of a government assurance fund);
- Job losses for Albertans currently supporting a profitable government department;
- Allocation of cost and service offering to other provinces / countries, and the loss of associated revenue stream for Alberta;
- Reduced accessibility of land data for research and matters of societal interest;
- Security issues with future models in which the administration and control of public records could be subject to fraud and manipulation.

Our government has also pointed to other provinces as examples of successfully privatized land titles system. However, the reasoning being put forth as justification for this undertaking in Alberta has no merit. Saskatchewan's ISC earned nearly \$21 million in NET income last year. This meant an increase in value for the shareholders of this company, not \$21 million in revenue for the Saskatchewan government or its people. Outsourcing of these services to public companies also manipulates stock trade shareholders which would benefit from these revenue streams. These shareholders may not even be Canadian, let alone from Saskatchewan.

As business owners, property owners and managers of the largest asset that many Albertans own, ACMA is advocating for the land title rights of these individuals. We would call on the Alberta Government to respect the rights of the public to benefit from a profitable, publicly funded government service. A government decision to divert this revenue to individual or corporate shareholders and support a private system would be tantamount to gifting government funds, currently earned by Albertans for this province's benefit, to the owners of a private system. We do not believe this would be an acceptable action on the part of this government.

As you can see your decision to privatize the Alberta Land Titles would not only be a mistake, it would also impact Albertans through reduced income for government services, create unemployment, pose security issues with third party vendors and also increase costs to MANY that use the service daily. Should there be feedback on this matter that you would like to share we would also value that discussion.

Respectfully,

The Board of Directors

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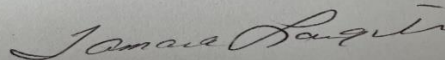
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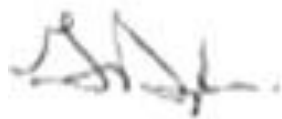
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