Multi-Employer Benefit Plan Council of Canada

The expert voice of multi-employer benefit interests in Canada

July 28, 2026

The Honorable Justin Wright
Minister of Primary and Preventative Health Services
227 Legislature Building
10800 – 97 Avenue
Edmonton, AB T5K 2B6
PPHS.minister@gov.ab.ca

Re: Alberta Bill 11, Changes to the Alberta Health Care Insurance Act

Dear Minister Wright:

Further to our letters to your office dated March 18 and June 1, 2026, herein attached; the Multi-Employer Benefit Plan Council of Canada (MEBCO) wishes to acknowledge that representatives from MEBCO were added to the Working Group on Alberta Bill 11 in respect of the payers of first and last resort. We, thank you.

We wish to note:

1. MEBCO received no acknowledgment to our communications which raised very serious concerns about Bill 11.
2. MEBCO is of the view that multi-employer health plans are **not** employer-sponsored plans as described in the legislation. The multi employer health plan is not designed by nor influenced by an employer of any employee. Contributions to multi-employer plans are part of an overall wage package often voted on by union members. Here we reference Part 3, Division 1 (Drug & Supplementary Benefit Plans),sub-sections 74(1) (e) & (f) define employer and employer-sponsored drug & supplementary benefit plan. These definitions are exhaustive. Section 74(2) clarifies that certain employer-sponsored plans are included in the Division; multi-employer trusteed plans clearly are not.
3. Multi-employer health plans are governed by a fiduciary board of trustees many of which have no employer trustees. As trustees no one (including an employer applicable) have a conflict of interest by influencing a plan design.
4. We suggest the exclusion of multi-employer plans be clarified for your insurer and third-party payers so that there is not widespread uncertainty and confusion with the associated blowback on the government and Price Waterhouse Coopers come October 1, 2026.
5. The Bill's provisions conflict with its own prohibition on discrimination since, in an environment where there is a fixed amount for benefits and a requirement to continue benefits for persons over 65, it will be persons under 65 who will bear the Bill 11 cost including having benefits reduced or terminated. In the immediate term, as we pointed out, this will have a

negative impact on the health and life expectancy of Albertans and likely increase the cost of health care borne by the Alberta government.

MEBCO offered to meet with your office earlier, and we remain willing to meet with the government notwithstanding that we believe multi-employer health plans are exempt from Bill 11.

On behalf of MEBCO's members and their Albertan active and retired members and their families, we remain

In solidarity,

Alex McKinnon
President

cc: sayid.Ahmed@gov.ab.ca, Sayid Ahmed, Chief of Staff, Minister of Primary and Preventative Health Services (PPHS)

cc; andrea.nagle@gov.ab.ca, Andrea Nagle, Executive Director, Government of Alberta