

Clause embodied in Report No. 6 of the Administration Committee, as adopted by the Council of the City of Toronto at its meeting held on May 21, 22 and 23, 2002.

**3****Feasibility of a Lobbyist Registration Policy  
Similar to Provincial and Federal Models**

*(City Council on May 21, 22 and 23, 2002, adopted this Clause, without amendment.)*

**The Administration Committee recommends that:**

- (1) the following report (April 23, 2002) from the City Solicitor be received; and**
- (2) the Chief Administrative Officer be requested to submit a report to the Administration Committee for its meeting scheduled to be held on September 10, 2002, on a City Lobbyist Registry based on the Federal/Provincial codes:**

Purpose:

To report as requested on a motion to replace the present ['bidders'] lobbying disclosure policy for certain competitive calls for services or materials with a lobbyist registration policy similar to the provincial and federal models.

Financial Implications and Impact Statement:

The adoption of a lobbyist disclosure or registration policy applicable to all City business transactions would involve administrative costs such as additional costs for the Purchasing and Materials Management Division and City Clerk's Division to monitor business transactions and to log or register lobbyists.

An application for special legislation would involve certain costs, including a filing fee, publication costs, and the cost of printing the private bill and resultant Act in the annual statutes, estimated at \$6000.

Recommendations:

It is recommended that:

- (1) the Chief Administrative Officer and the City Solicitor meet with Provincial staff to review the status of the City's request for legislation authorizing municipalities and their local boards to enact lobbyist registration by-laws, including enforcement provisions, based upon the Ontario *Lobbyist Registration Act, 1998*, and to explore the feasibility of:**

- (a) amending the *Municipal Act, 2001* (Bill 111), by adding the following section respecting lobbyist registration by-laws:

“\_\_\_A municipality may pass by-laws respecting lobbying, and the by-law may;

- (a) require the registration of lobbyists who lobby municipal officials or employees or members of council; and
  - (b) adopt by reference, in whole or in part, with such changes as the council considers appropriate, the provisions of the *Lobbyist Registration Act, 1998* and the regulations enacted under it.”; or
- (b) an application for special legislation as an alternative approach.

Background:

At its meeting held on February 13, 14 and 15, 2002, Council referred a motion, the recommendations of which are set out following, to the Administration Committee and requested the Chief Administrative Officer, in consultation with the Acting City Solicitor, to submit a report on this matter for consideration with the motion:

**NOW THEREFORE BE IT RESOLVED THAT**, recognizing the close similarities both in magnitude of funding and scope between the RFP calls and ‘tender calls’ for bidding on proposed contracts of the federal, provincial and Toronto municipal governments, City Council should put in place equally binding regulations for a bidder and lobbyist registry which discloses and regulates all business actions in a timely manner to provide for complete transparency through any proposed or ongoing business contracts with the City of Toronto;

**AND BE IT FURTHER RESOLVED THAT** in the preparation of the City’s policy, City Council adopt the Federal or Provincial Lobbyist Registry Code as a model, with amendments applicable to the City of Toronto’s situation.

Comments:

- (a) City Lobbying Disclosure Policy:

By its adoption of Clause No. 3 as amended of Report No. 14 of The Administration Committee at its meeting held on July 4, 5 and 6, 2000, Council adopted the “interim” lobbying disclosure policy that applies to tender, quotation and proposal calls for goods and services estimated to be above the Bid Committee award limit of \$2 million (now \$2.5 million). By its adoption of Clause No. 3 as amended of Report No. 2 of The Administration Committee, at its meeting held on March 6, 7 and 8, 2001, Council adopted detailed criteria to determine the application of its lobbying disclosure policy as set out in the “Lobbying Disclosure Policy: Certain Requests for Proposals and Tender/Quotation Calls”.

The City policy as noted above is not a lobbyist registration policy as such. Rather, it is a ['bidders'] lobbyist disclosure policy for certain requests for proposals and tender/quotation calls. This approach reflects, in part, the view that the City did not possess the legal authority to enact and enforce an effective lobbyist registry system, but could deal with lobbying concerns through other policies. This report re-examines this approach in light of recent court decisions and statutory amendments.

(b) Provincial *Lobbyist Registration Act*, 1998:

The Provincial *Lobbyists Registration Act*, 1998 (the "Provincial Act") was based on the Federal *Lobbyists Registration Act*, which had come into force ten years earlier in 1988. Under the Provincial Act, paid lobbyists are required to report their "lobbying of public officials" (as defined) by filing a return with the Registrar, the Integrity Commissioner. The register of returns is available for public inspection and is also available for review on the Internet. The Provincial Act only applies to paid lobbyists and provides for three categories of paid lobbyists. There are certain exemptions from the application of the Provincial Act, for example, members of council or City staff when acting in their official capacity. On its face, the Provincial Act discriminates as it does not apply to all lobbyists, and has different requirements for the three classes of lobbyists.

The Provincial and Federal Lobbyist Registration Acts have enforcement provisions far stronger than those which apply to a by-law enacted under the *Municipal Act*. For example, both the Provincial and Federal Acts have a fine of up to \$25,000 instead of the \$5000 that applies to most *Municipal Act* offences. The Provincial Act also has a special offence provision for when a consultant lobbyist knowingly places the public office holder in a position of real or potential conflict of interest.

(c) Information Disclosed:

Attached as Appendix 1 is a table that compares the information disclosed under the City's policy and the Provincial Act. Column 2 of the table lists the information required to be disclosed under section 4.4 of the City's Lobbying Disclosure Policy. Column 3 of the table lists the information provided under the Provincial Act.

The City's policy applies to the persons bidding on certain City contracts, while the Provincial Act applies to paid lobbyists and not to their clients or employers. Despite this difference in application, the information provided is quite similar in that in both cases information is provided on the client, the persons lobbying, the subject matter of the lobbying, the general nature of the communication and the persons lobbied. In the case of the Provincial Act, information on government subsidies and contingency fees is also provided.

Detailed descriptions of the communications, i.e., accounts of discussions between lobbyists and elected officials or staff, are not required under either the City or Provincial forms due to limitations imposed by freedom of information legislation on the collection and dissemination of such information. The Director of Corporate Access and Privacy has noted that MFIPPA applies to all information collected or created by the City. An

individual's views and opinions about the content of a discussion with an elected official or staff would constitute the personal information of both parties. A significant issue is verification of the accuracy of accounts of these discussions. MFIPPA requires that government institutions take reasonable steps to ensure the accuracy of personal information on which it relies. Therefore, prior to distributing or relying on the information, it would be necessary to have in place a process to ensure that there is agreement between the parties as to content. Under MFIPPA, individuals have a right to attach a statement of disagreement to any record containing their own personal information. Elected officials, staff and lobbyists would all have this right in addition to other remedies which may be available in law. The utility of accounts of discussions, given the issues of accuracy, disagreement and timeliness, is therefore diminished. Accordingly, and in order to comply with the motion's direction related to consistency with the Provincial and Federal models, the City's information collection practices should also be consistent with these models.

(d) Section 102 of *Municipal Act*:

Section 102 of the current *Municipal Act* is as follows:

102. Every council may pass such by-laws and make such regulations for the health, safety, morality and welfare of the inhabitants of the municipality in matters not specifically provided for by this Act and for governing the conduct of its members as may be deemed expedient and are not contrary to law.

Although the scheme of the new *Municipal Act, 2001* is different, it does contain a "general welfare" residual provision as follows:

130. A municipality may regulate matters not specifically provided for by this Act or any other Act for purposes related to the health, safety and well being of the inhabitants of the municipality.

(e) Challenges to Former City of Toronto Lobbyist Registration By-law:

The former City of Toronto had enacted a lobbyist registration by-law in 1989 (By-law No. 183-89) under the authority of what is now section 102 of the *Municipal Act*, as amended. An application was made to quash the by-law as illegal. Challenges to the by-law included an interpretation of section 102 of the *Municipal Act*, perceived conflict between the by-law and professional ethics, the validity of municipal regulations respecting the conduct and discipline of lawyers, and Charter challenges respecting infringement of freedom of speech and freedom of assembly rights. The court application did not proceed and the by-law was repealed and replaced by lobbying disclosure provisions that were added to the City's procedure by-law.

(f) Hudson Case:

A recent Supreme Court of Canada decision dealt with a similar "general welfare provision" in subsection 410(1) of the Quebec *Cities and Towns Act*, which is as follows:

410. The council may make by-laws:

- (1) To secure peace, order, good government, health and general welfare in the territory of the municipality, provided such by-laws are not contrary to the laws of Canada, or of Québec, nor inconsistent with any special provision of this Act or of the Charter;

In the case of 114957 *Canada Ltee (Spraytech, Societe d'arrosage) v. Hudson (Town)*, (2001) 200 D.L.R. (4th) 419 (S.C.C.) the Supreme Court of Canada (the "SCC") ruled that a municipality may restrict the use of pesticides within its perimeter to specified locations and for enumerated activities, despite the absence of any specific grant of legislative power to do so. As there was no Provincial enabling legislation relating to pesticides, the SCC found that subsection 410(1) of the Quebec *Cities and Towns Act* authorized the enactment of the pesticides by-law by the Town of Hudson.

The SCC upheld the validity of the Town of Hudson pesticides by-law on the grounds that it was enacted "in the public interest and in response to health concerns expressed by residents"; that the by-law is not in conflict with any existing provincial or federal legislation and that, although discriminatory, such discrimination constituted "necessary incidents" to the power delegated by the Province in subsection 410(1) of the Quebec legislation.

While noting that such omnibus provisions do not confer unlimited powers, the SCC held that the Town's by-law fell squarely within the health component of subsection 410(1) of the Quebec *Cities and Towns Act*. The SCC noted that such omnibus provisions allow municipalities to "respond expeditiously to new challenges facing local communities, without requiring amendment of the provincial enabling legislation." The by-law, the court held, responded to the concerns of its residents about alleged health risks caused by non-essential uses of pesticides within Town limits.

- (g) Lyons Case:

The City's [bidders'] lobbying disclosure policy was subject to an unsuccessful court challenge in the case of *Jeffrey S. Lyons v. City of Toronto* 24 M.P.L.R. (3d) 129. A copy of the court decision upholding the City's by-law is filed with the City Clerk. In paragraph one of the Judge's endorsement, the City's policy is described as follows:

This is an application ... to quash a resolution of the City putting in place a business policy to be followed, ..., by applying a contractual disclosure requirement on bidders for \$2 or \$2.5 million and larger contracts with the City... What is required is that bidders disclose the fact of any representations made by or on their behalf which promote the bids or opposes those of another to City staff or City councillors. It is not required by the form in use or by the language of the policy that there be revelation of the content of representations, but just that it, or they, occurred. Such representations are not limited or in any way controlled, but they must be reported, or the bidder risks losing the right to bid in the future for a period of one year from the time of non-disclosure. ...

The Judge's decision upholding the City policy in the Lyons case relies on the rationale set out in several business decision cases interpreting how a municipality, as a corporation, has the power to conduct business. These cases support the position that resolutions passed within a municipality's business activities jurisdiction should be upheld if they are made for valid business purposes and there is no breach of a charter right. In the Lyons decision, the Judge also emphasized that it was not "the business of the court to interfere with the business policy decisions made by a multi-billion dollar operation as have been made here."

The Judge also made reference to the Hudson case and noted that the City policy is supported by the provisions of Section 102 of the *Municipal Act* authorizing activity "...for the...welfare of the inhabitants in matters not specifically provided for by this Act and for governing the conduct of its members as may be deemed expedient and are not contrary to law". The Judge was careful to note that the [business] decision to include reporting requirements in bidders' contracts was not an indirect regulation of lobbyists or lobbying. The Judge also noted: "There is a substantial difference between efforts made to regulate lobbyists who speak for others and the concept of lobbying persons who may have influence in regard to acceptance of bids. I see nothing outside the scope of explicit and implied authority in the City deciding to deal contractually as it has done here with certain contacts in connection with large proposed municipal contracts". Accordingly, the Lyons case does not stand for the principle that section 102 of the *Municipal Act* would authorize a lobbyist registration policy or by-law, similar to the provincial or federal models.

(h) *Municipal Act, 2001:*

The *Municipal Act, 2001* (the "New Act") is intended to provide municipalities with greater flexibility to organize their affairs and deliver services. There is no specific provision dealing with lobbying or lobbyists in the New Act. Nor do the City's powers under Part IV of the New Act, respecting the licensing and registration of business, authorize the regulation of lobbyists' businesses (assuming this class of business could be successfully defined) in the manner set out in the Provincial and Federal models. While the general provisions of the New Act are supportive of some form of lobbying disclosure, the New Act does not permit the regulation of lobbyists in the form of lobbyist registration requirements similar to the Provincial and Federal models.

However, the City's present business policy of disclosure of lobbying with respect to certain procurement processes would be authorized under the City's natural person powers in section (8) of the New Act, as follows:

- (8). A municipality has the capacity, rights, powers and privileges of a natural person for the purpose of exercising its authority under this or any other Act.

An argument could also be made that provisions respecting lobbying disclosure (but not lobbyist registration) could be included in the City's procedure by-law under section 238 of the New Act, to the extent to which the disclosure relates to "proceedings". The

description of the purposes of a municipality, in section 2 of the New Act, may provide additional support for this approach. However, this approach proved to be problematic in the experience of the former City of Toronto resulting in the lobbying provisions in the former City of Toronto's procedure by-law being repealed. As the same problems would still apply to this approach, an amendment to the City's procedure by-law (Municipal Code Chapter 27, Council Procedures) is not recommended.

Subsection 9(3) of the New Act provides a general grant of "governmental powers", i.e., powers a natural person or corporation do not have. These include, among other powers, the powers to regulate and prohibit respecting a matter, to require persons to do things, and to provide for registration requirements. However, these powers are limited to by-laws passed under section 11 of the New Act which, in turn, permits the City, as a single tier municipality, to pass by-laws respecting matters within ten "spheres of jurisdiction", which matters do not include lobbying or lobbyists as such.

The City has already requested the Province "to provide legislation authorizing the enactment by municipalities and their local boards, of lobbyist registration by-laws including enforcement provisions, based upon the New Ontario Lobbyist Registry legislation". No reply has been received to date.

As the City's earlier requests for general legislation predate the enactment of the New Act, the City should explore with Provincial staff the feasibility of requesting an amendment to the New Act to provide for the power to pass a lobbyist registration by-law. For example, the following provision, based on the wording of section 435 of the New Act respecting the adoption of other codes, could be considered:

- \_. A municipality may pass by-laws respecting lobbying, and the by-law may,
  - (a) require the registration of lobbyists who lobby municipal officials or employees or members of council; and
  - (b) adopt by reference, in whole or in part, with such changes as the council considers appropriate, the provisions of the *Lobbyist Registration Act, 1998* and the regulations enacted under it.

If Provincial staff indicate that the Minister is not ready to consider general legislation to permit lobbyist registration by-laws, then an application for special legislation could be considered. If the Province permits special legislation in an adoption by reference format, the special legislation could be as follows:

- \_. The Council of the City of Toronto may pass by-laws respecting lobbying, and the by-law may;
  - (a) require the registration of lobbyists who lobby municipal officials or employees or members of council; and
  - (b) adopt by reference, in whole or in part, with such changes as the council

considers appropriate, the provisions of the *Lobbyist Registration Act, 1998* and the regulations enacted under it, as amended from time to time.

### Conclusions:

The motion proposes that the City broaden its existing policy to, in effect, adopt a lobbyist registration policy similar to the Provincial and Federal models, which applies to all business transactions. Past experiences indicate that if the City decides to take this action, the action will likely be subject to a court challenge.

The term “welfare” as a component of “health, safety, morality and welfare of the inhabitants” as set out in section 102 in the *Municipal Act* is not usually given much weight, on the basis that presumably almost any by-law could be passed for the welfare of the inhabitants. In the leading case of *Re Morrison v. Kingston*, [1937] 4 D.L.R. 740, it was held that “The power to legislate for the “welfare” of the inhabitants is too vague and general to admit of definition. It may mean so much that it probably does mean very little”. Even given the recent trend in jurisprudence to the benevolent construction of municipal powers, a court is unlikely to allow reliance on the “welfare” power alone as authorization for a complete scheme of regulation of lobbyists. As the recent Hudson judgement in the Supreme Court of Canada states, general residual clauses do not include unlimited power.

While the Hudson case is an example where the general welfare provision in a municipal Act was used as a residual power to authorize a significant regulation of the use of pesticides, on its facts, the “pesticides by-law” in Hudson related to health and the environment. Despite the reference to section 102 of the *Municipal Act* in the Lyons decision, the courts will likely limit the application of the general welfare provisions to cases where there are similar concerns respecting health and the environment or safety matters. As noted earlier, the Lyons decision does not rely solely on section 102 of the *Municipal Act*, but also on the rationale set out in several business decision cases. It should also be noted that there was no discussion of the Morrison case, noted above, in either the Hudson or Lyons decisions.

The appeal of the Lyons decision was abandoned, so the decision of Mr. Justice Coe stands as supporting lobbyists disclosure as a business policy and not as an indirect regulation of lobbyists or lobbying. By implication, the decision supports the argument that the general welfare power in section 102 of the *Municipal Act* does not support the regulation of lobbyists or lobbying. This argument is quite strong, given the different facts of the Hudson case, and the additional fact that the Provincial Pesticides Act specifically contemplated municipal by-laws.

There is also the statement, given in separate reasons by concurring Justices in the Hudson case, that a pressing concern in the opinion of the local community is not enough to rationalize the use of the residual power. Rather, the matter must relate to the immediate needs of the community. It is questionable whether this test could be met, particularly as there is still support for the principle that a stricter rule of construction may be appropriate where the municipality is attempting to use a power that restricts common law or civil rights.



Without specific legislative authority to regulate that includes a power, directly or indirectly, to discriminate, a municipal lobbyist registration policy would be subject to a court challenge likely on the basis, among others, that it is discriminatory. In the Hudson case, the SCC read in the ability of the municipality to discriminate as necessarily incidental to the regulation of pesticides and the objectives of the regulation. The test was that there could be no regulation on such a topic without some form of discrimination. It is difficult to argue that a lobbyist registration system would meet this test, should there be distinctions drawn among classes of lobbyists; it would be difficult to show that such distinctions were necessarily incidental to the objective sought.

The term “welfare” is not included in the new general welfare provision, section 130 of the new *Municipal Act, 2001*. The term “well-being” has now been substituted for “welfare” in section 130. While the terms are similar, the scheme of the New Act does not support any additional argument that the term “well-being” would authorize a lobbying disclosure or lobbyist registration system. A court would likely take notice of the fact that section 130 is grouped with specific health, safety and nuisance provisions in the part of the New Act entitled “Health Safety and Nuisance” and find that the term “well being” is supportive of health and safety matters.

Accordingly, it is my opinion that neither the New Act nor the Hudson and Lyons cases provide the City with the legal authority to enact and enforce an effective general lobbyist registry system that is similar to the Provincial and Federal models.

It is therefore recommended that if the present lobbying disclosure policy is to be expanded beyond what can reasonably be defended as a business decision related to the City’s procurement activities (i.e., an exercise of its “natural person powers” as opposed to its “governmental powers”), that the City explore the feasibility of amendments to the *Municipal Act, 2001* or, alternatively, make an application be for special legislation.

Staff of the Chief Administrator’s Office and the City Clerk’s division, and the Director of Purchasing and Materials Management were consulted in the preparation of this report.

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List of Attachments:

Appendix 1: Information provided on City and Provincial Forms.

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## Appendix 1

### Information provided on City and Provincial Forms

Information	City Section 4.4 of Lobbying Disclosure Policy	Province Information as Summarized in City Solicitor's Report
Client information	(i) the name, address and telephone number of the Proponent or Bidder	(a) basic information on the ... client or employer: name, address and the nature of the business or activities;  (b) information on other parties who have an interest in (e.g., a subsidiary or parent corporation) or who support the lobbying activity by contributing at least \$750;
Information on person lobbying or "lobbyist"	(ii) the name, address and telephone number of each person retained, employed or designated by such Proponent or Bidder who has engaged in Lobbying in relation to the Proposal or Bid;	(a) basic information on the individual lobbyists, the senior officer...: name, address and the nature of the business or activities;
Subject matter of the lobbying	(iii) the Request or Call document number in respect of which each person retained, employed or designated by such Proponent or Bidder has engaged in Lobbying;	(d) information on the nature of the lobbying activity or proposed activity including the following:  (d)(i) the subject matter of lobbying and, if an in-house lobbyist (organizations), the subject matter during the six months period of a return and the expected subject matter for the next six months;  (d)(ii) specific information on the undertaking, e.g., the proposed bill or program;

Information	City Section 4.4 of Lobbying Disclosure Policy	Province Information as Summarized in City Solicitor's Report
Description of general nature of Communication	(iv) a description of the general nature of communications that each person retained, employed or designated by such Proponent or Bidder has made in Lobbying; and	(d)(v) the communication techniques to be used, including "grass- roots communication" (as defined in the Act).
Person lobbied	(v) the name of the person and department before whom such Proponent or Bidder has engaged in Lobbying.	(d) information on the nature of the lobbying activity or proposed activity including the following:  (d)(iii) the ministry, agency, etc. they have lobbied or expect to lobby;  (d)(iv) MPPs or MPP staff they have lobbied or expect to lobby;
Information on certain financial matters		(c) information on financial matters: government subsidies to the client or employer, and contingency fees for the services of a consultant lobbyist.

**The Administration Committee also submits the following communication (February 21, 2002) from the City Clerk:**

City Council, at its meeting held on February 13, 14 and 15, 2002, referred the following Motion to the Administration Committee and the Chief Administrative Officer, in consultation with the Acting City Solicitor, was requested to submit a report on this matter for consideration therewith:

- (2) Binding Lobbyist Disclosure Policy for a Transparent and Open Government.

Moved by: Councillor Walker

Seconded by: Councillor Miller

**"WHEREAS** there exists the educated public opinion of 'toothless-ness' and inefficacy of Council's non-existent Lobbyist Disclosure By-law No. 462-2000; and

**WHEREAS** the Ontario Superior Court of Justice on October 2, 2001, dismissed the application of noted corporate lobbyist, Jeffrey S. Lyons, '...to quash the resolution of the City of Toronto...', passed by City Council on July 6, 2000, as By-law No. 462-2000; and

**WHEREAS** the Honourable Justice Coe of the Ontario Superior Court of Justice, in his decision dismissing Jeffrey S. Lyons' application, also awarded the City costs against Jeffrey S. Lyons; and

**WHEREAS** the absence of any requirement for lobbyists to register and disclose their activities involving the City has provided 'an immunity' for lobbyists from full public scrutiny and accountability, and contributed mightily to the scandals presently enveloping our City; and

**WHEREAS** the Ontario Superior Court of Justice states (October 2, 2001), in its dismissal, that the 'decision made by responsible municipal officials to include reporting requirements with respect to bidders' contracts with the City in connection with prospective City business in procurement of goods and services is not an indirect regulation of lobbyists or lobbying. Bidders can do all the lobbying they want, either directly or through lobbyists, but they must report the fact of such contacts having been made.'; and

**WHEREAS** Section 102 of the Municipal Act authorizes activity '...for the... welfare of the inhabitants in matters not specifically provided for by this Act (Municipal Act) and for governing the conduct of its members as may be deemed expedient and are not contrary to law'; and

**WHEREAS** larger RFP (or RFQ) calls and some 'tender calls' have lengthy bidding periods involving large numbers of City staff assigned to the task, the most probingly detailed of daily records should be kept regarding any exchange between the registered lobbyist and the City, including all of its agencies, boards, and commissions and any exchange between the lobbyist and the City's contracted partners in relation to any proposal considered by the City; and

**WHEREAS** the federal and provincial governments adhere to lobbyist registry provisions enacted autonomously, which effectively and more stringently protect the people's representation from outside influence, such as any gifts in kind, any monies, any loans or passages, et cetera, given on behalf of bidder or lobbyist, by the bidder or lobbyist to any contacted City parties in relation to a registered RFP or 'tender call' for contract; and

**WHEREAS** past and present encounters of bidder and lobbyist strategies have infiltrated the effectiveness and ability of City Council's elected officials and appointed City staff to protect the public interest, including access to information, due to the lack of full scrutiny into the City's finances, checks and balances; and

**WHEREAS** there is a higher and greater public good that warrants a binding lobbyist disclosure policy for the City, rather than constantly deferring to opinions of high-handed and high-priced corporate lobbyists and their employers;

**NOW THEREFORE BE IT RESOLVED THAT**, recognizing the close similarities both in magnitude of funding and scope between the RFP calls and ‘tender calls’ for bidding on proposed contracts of the federal, provincial and Toronto municipal governments, City Council should put in place equally binding regulations for a bidder and lobbyist registry which discloses and regulates all business actions in a timely manner to provide for complete transparency through any proposed or ongoing business contracts with the City of Toronto;

**AND BE IT FURTHER RESOLVED THAT** in the preparation of the City’s policy, City Council adopt the Federal or Provincial Lobbyist Registry Code as a model, with amendments applicable to the City of Toronto’s situation.”

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Councillor Michael Walker, St. Paul’s, appeared before the Administration Committee in connection with the foregoing matter.