

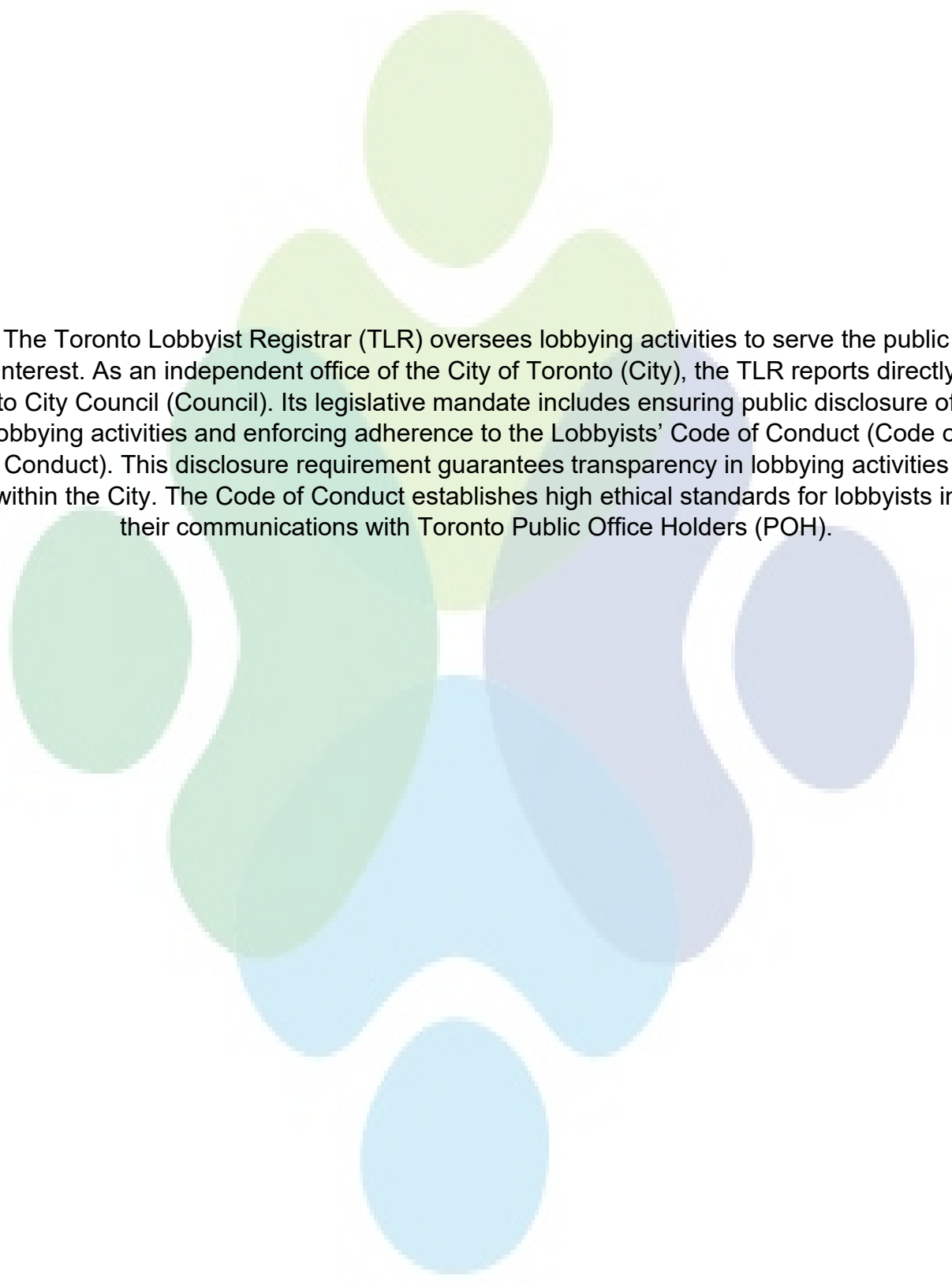
Annual Report 2024



The Toronto Lobbyist Registrar's Office respectfully acknowledges that its office is located on the traditional territory of many nations including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples and is now home to many diverse First Nations, Inuit and Métis peoples. We also acknowledge that Toronto is covered by Treaty 13 with the Mississaugas of the Credit.



The City of Toronto acknowledges all Treaty peoples – including those who came here as settlers – as migrants either in this generation or in generations past – and those of us who came here involuntarily, particularly those brought to these lands as a result of the Trans-Atlantic Slave Trade and Slavery. We pay tribute to those ancestors of African origin and descent.



The Toronto Lobbyist Registrar (TLR) oversees lobbying activities to serve the public interest. As an independent office of the City of Toronto (City), the TLR reports directly to City Council (Council). Its legislative mandate includes ensuring public disclosure of lobbying activities and enforcing adherence to the Lobbyists' Code of Conduct (Code of Conduct). This disclosure requirement guarantees transparency in lobbying activities within the City. The Code of Conduct establishes high ethical standards for lobbyists in their communications with Toronto Public Office Holders (POH).

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Registrar's Message

Dear Members of City Council and Citizens of Toronto,

It is my privilege to present the 2024 Annual Report for the Toronto Lobbyist Registrar. This marks my first full year as Toronto's Lobbyist Registrar, and I remain deeply committed to upholding the principles of transparency, integrity, and accountability in municipal governance.



In 2024, our office continued its vital work in ensuring that lobbying activities in the City of Toronto are conducted openly and ethically. We focused on strengthening compliance with the Lobbying By-law and the City of Toronto Act, 2006, while enhancing public trust in the integrity of City decision-making.

Our key achievements this year included:

- Promoting compliance and accountability through the registration and disclosure of lobbying activities;
- Delivering guidance and support to lobbyists, public office holders, and the public on the requirements of the Lobbying By-law;
- Expanding outreach and education to increase awareness of lobbying rules, including targeted sessions for City divisions, agencies, and external stakeholders;
- Advancing enforcement efforts to address non-compliance and uphold the By-law's purpose of transparency in lobbying.

The work of this office reflects our shared commitment to ensuring that lobbying is conducted in a manner that serves the public interest. I am grateful to City Council, City staff, the lobbying community, and all Torontonians for your engagement and support in this important mission.

As we look ahead, our office will continue to collaborate with stakeholders to strengthen the City's lobbying framework, respond to emerging challenges, and promote good governance. I welcome your continued dialogue and partnership in safeguarding the integrity of City government.

Thank you for your trust, and for your dedication to transparency and ethical conduct in our city.

Respectfully submitted,

Stephen Littlejohn

What we do at the Toronto Lobbyist Registrar

Our Core Mandate:

The Toronto Lobbyist Registrar promotes and enhances the transparency and integrity of City government decision-making. This is accomplished through the public disclosure of lobbying activities via the online registry and the regulation of lobbyists' conduct, as set out in Chapter 140 of the Toronto Municipal Code, Lobbying (the Lobbying By-law).

What We Do

- We ensure that lobbying activities are publicly disclosed and that lobbyists comply with registration and reporting requirements.
- We review, verify, approve, or refuse registrations in accordance with the By-law, and revoke, suspend, or remove registrations where compliance is not maintained.
- We accept confidential inquiries regarding potential violations, conduct investigations of alleged breaches and impose penalties where breaches are found.

Why It Matters:

- The public and POH should have the ability to know who is attempting to influence City government decisions.
- Ethical and transparent lobbying is essential to a responsive City government. It fosters civic engagement and supports open, democratic processes.

TLR TEAM

The Registrar

The duties of the Lobbyist Registrar, outlined in the *City of Toronto Act, 2006 (COTA)*, and Chapters 3 and 140 of the Toronto Municipal Code, include maintaining a public lobbyist registry, conducting independent and confidential inquiries, and advising on the administration and enforcement of the Lobbying By-law. The Registrar reviews compliance, investigates potential breaches, and advises Council on lobbying issues, ensuring transparency.

The Registrar prioritizes educating lobbyists on the Lobbying By-law to prevent non-compliance. Enforcement tools include suspending or revoking registrations, imposing conditions, and temporary lobbying bans. The Registrar can also prosecute breaches under the *Provincial Offences Act (POA)*.

Dedicated to education, the Registrar provides resources and training for lobbyists and informs the public about transparent lobbying practices. Social media is used to disseminate information, raise awareness, and engage with both lobbyists and the public to enhance compliance.

Inquiries and Investigations Counsel

Inquiries and Investigations Counsel provides a full range of legal and investigative services in a senior role to the TLR's Office, including, advocacy, advice, and the provision of services on legal matters that are consistent with the Lobbyist Registrar's public interest mandate. They also collaborate with the Registry Advisors to provide education and training initiatives for lobbyists, ensuring they understand and comply with lobbying regulations effectively.

Lobbyist Compliance Investigator

The Lobbyist Compliance Investigator is responsible for assisting the Inquiries and Investigations Counsel in conducting thorough investigations into potential breaches of the Lobbying By-law. The investigator gathers evidence, conducts interviews, and analyzes data to assess compliance. They also work closely with the Inquiries and Investigations Counsel to recommend appropriate actions, such as sanctions or enforcement measures, and contribute to the development of policies to strengthen regulatory frameworks.

Lobbyist Registry Advisors

The Lobbyist Registry Advisors provide front-line customer service and advice to lobbyists regarding the registration process, and to POH and the public regarding the purpose and content of the lobbyist registry. The Advisors uphold and support the public's right to access the lobbyist registry, ensure that lobbyists can register and promptly update their returns, and provide advice about compliance with the Lobbying By-law and the Lobbyists' Code of Conduct. The Lobbyist Registry Advisors participate as member of the TLR Team in providing outreach and education, making improvements to the TLR website; and developing interpretation bulletins and other information for lobbyists, POH, and the public.

Administrative Support

The Executive Assistant to the Registrar provides executive and administrative support to the Registrar and coordinates the work of the office. They also provide administrative support and assistance to the Lobbyist Registry Advisors.

The Administrative Assistant to the Inquiries and Investigations Counsel provides administrative support to the Inquiries and Investigations Unit.

Understanding the Lobbyist Registry Process

The TLR maintains and administers a publicly accessible online registry in compliance with s. 165 of COTA. This section mandates that the City keeps a registry of individuals lobbying POH and ensures it is available for public inspection. The registry can be accessed through our website at www.toronto.ca/lobbying, and the data is also available on the City's Open Data website at www.toronto.ca/open.

According to the Lobbying By-law, lobbying involves communicating with POH on various subjects, including decisions on by-laws, policies, programs, grants, purchasing, and applications for services, permits, licenses, or other permissions. Registration as a lobbyist is required before communicating with POH on any lobbying matter. The registration process is free and can be completed online on our website.

The registration process consists of two steps: first, registering as a lobbyist, and second, registering a subject matter. To register as a lobbyist, you must select your class of lobbyist (i.e., in house, consultant, or voluntary), create a profile, and set up an account. The next step is registering a subject matter, which is the issue or decision you intend to discuss with POH. This registration must be completed before any communication occurs. You can register multiple subject matters under one lobbyist registration but, each new topic requires a separate subject matter registration.

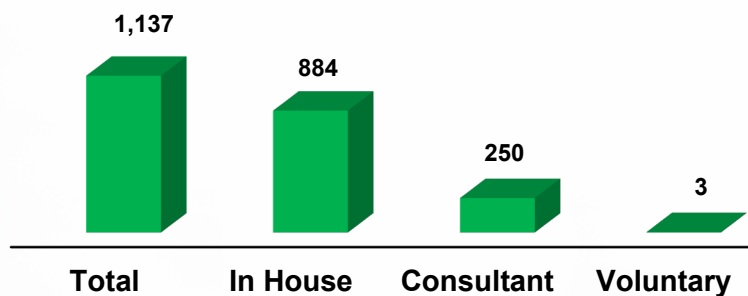
Upon completion and approval of the registrations, lobbyists receive a lobbyist registration number and a subject matter registration number. Both approvals are necessary before communicating about a subject matter with POH.

Within three (3) business days of communicating with a POH about a registered subject matter, lobbyists must return to the registry system to disclose the public office holder's name, the communication methods used, and the date of communication.

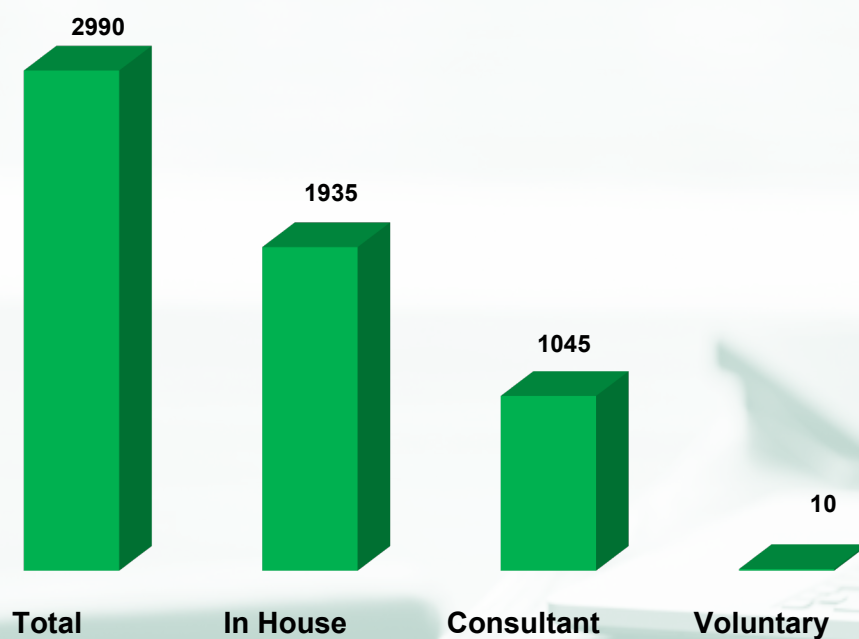
Advisors review all registrations and updates to ensure they meet the requirements of the Lobbying By-law. Once approved by an Advisor, the information is posted on the public online lobbyist registry. In 2024, the Advisors processed 2,809 lobbyist and 10,619 subject matter registration transactions.

2024 in Focus: Key Registry Metrics

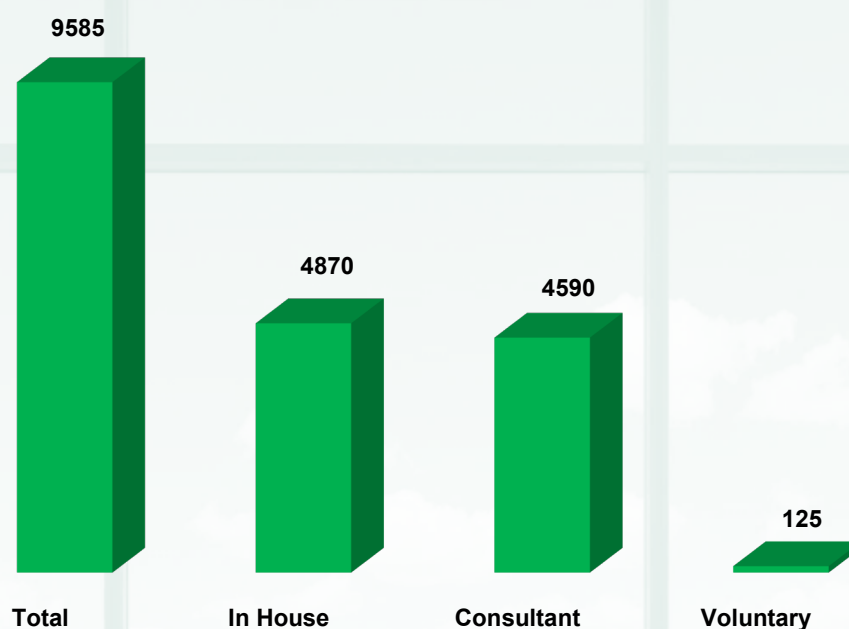
Lobbyist Registrations



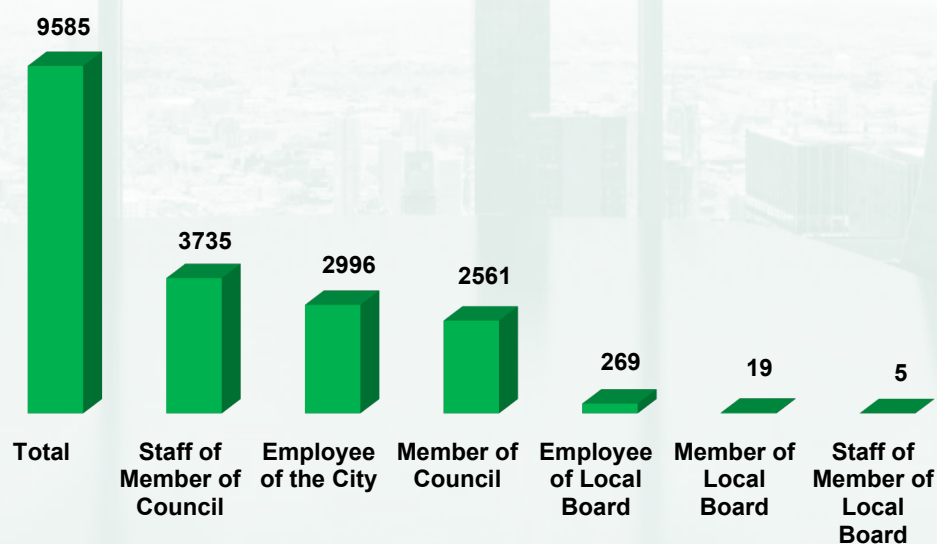
Subject Matter Registrations



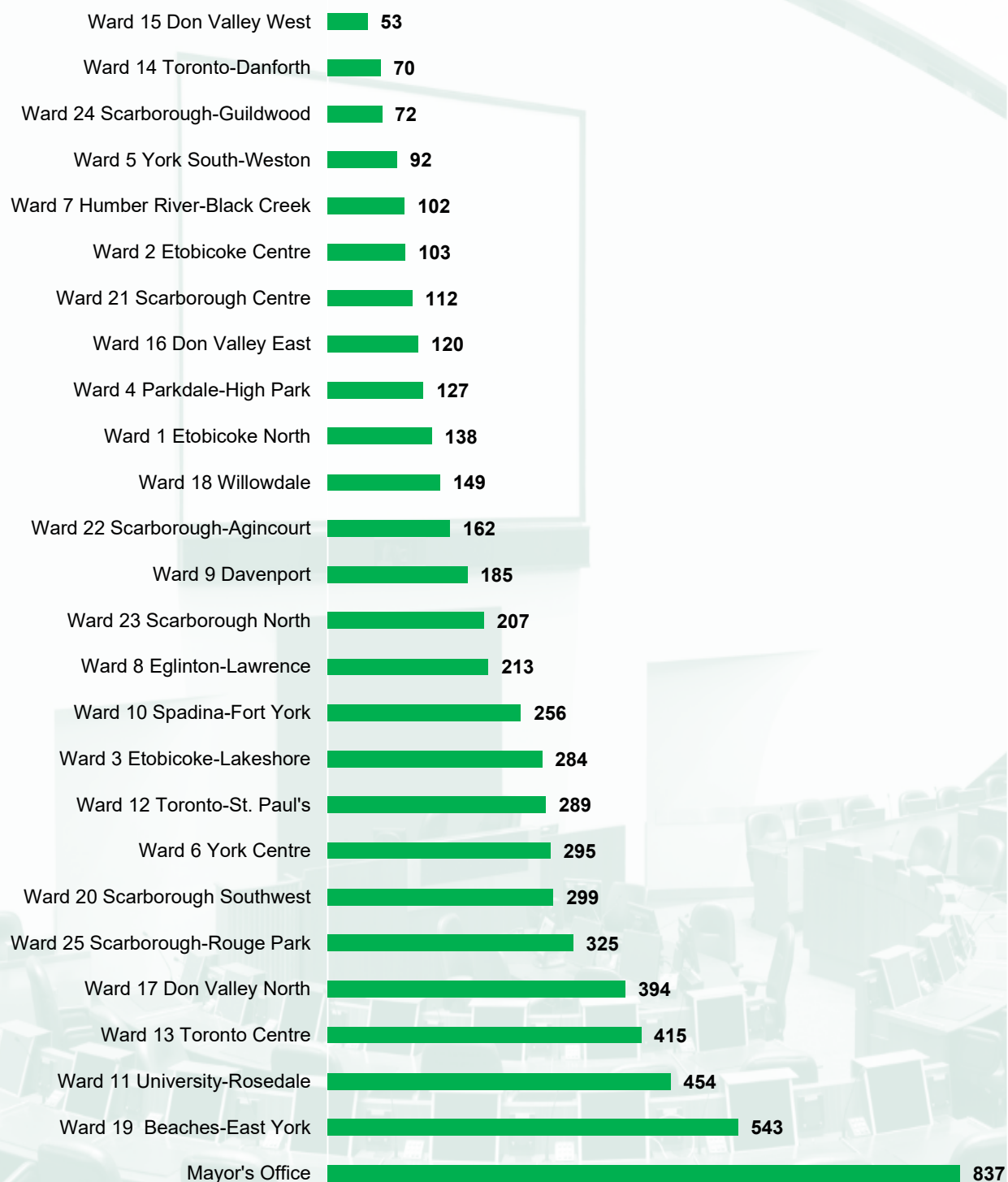
Lobbying Communication by Lobbyist Type



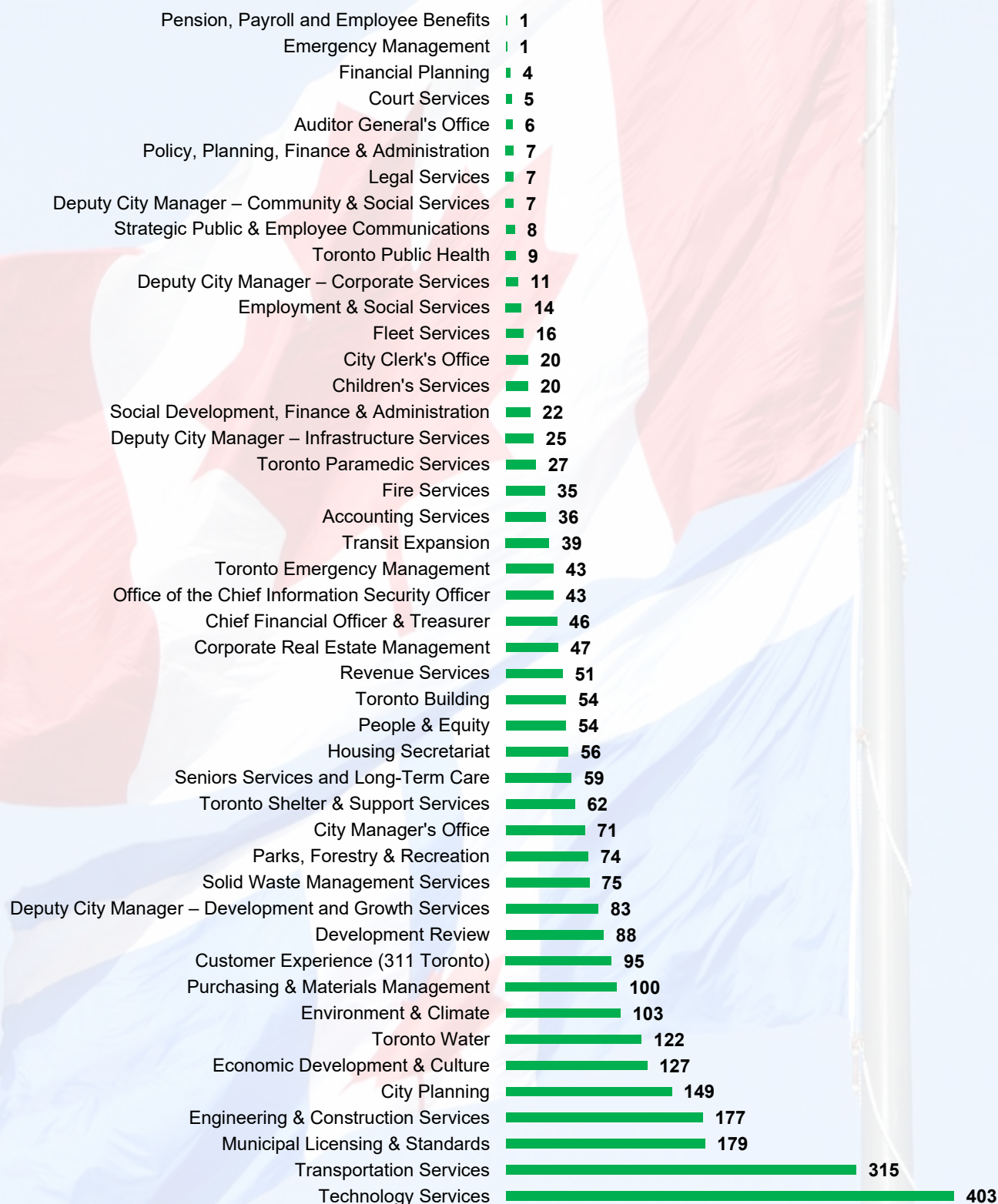
Lobbying Communications by Type of Public Office Holder Lobbied



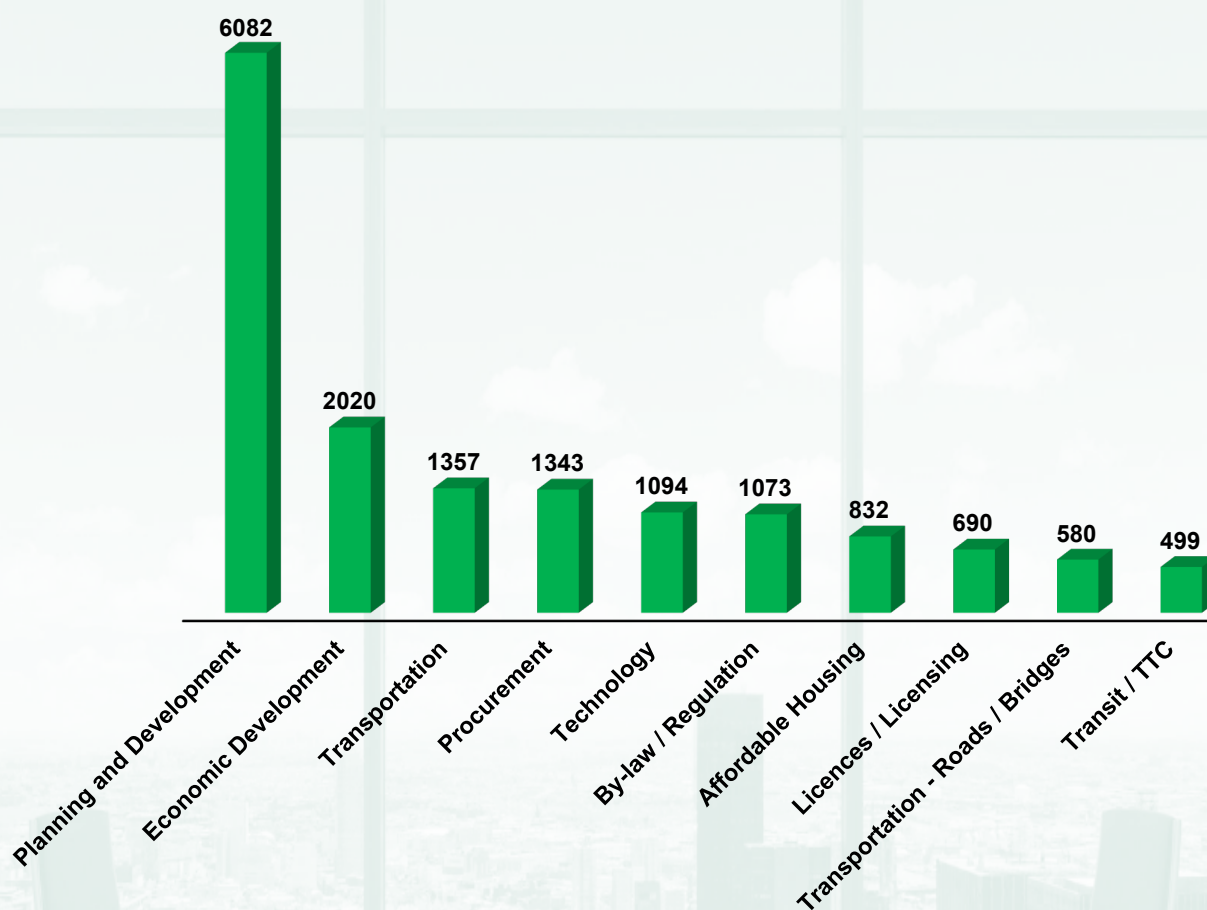
Lobbying Communications by Ward (Member of Council and Staff Member of Council)



Lobbying Communications by Divisions and Offices



Top Ten Subject Matter Categories by Number of Communications



*Each subject matter registration submitted by a lobbyist allows them to select up to three subject matter categories.

Investigations, Inquiries and Breach Prevention

The Registrar is responsible for conducting private inquiries and investigations to determine whether the Lobbying By-law has been breached. When a potential violation is reported, the Inquiries and Investigations Unit (Investigations Unit) first conducts an initial assessment to determine whether an inquiry is warranted. Many issues are resolved promptly at this stage, often informally — for example, by permitting a late registration or correction.

If there is sufficient evidence of a potential contravention and the matter cannot be resolved informally, the Registrar may authorize a formal inquiry. All inquiries are conducted in strict confidence in accordance with the *COTA* and the TLR Compliance Inquiries Procedures. If, during an inquiry, the Registrar forms the opinion that another law (such as the Criminal Code) may have been violated, the inquiry is suspended, and the matter is referred to the appropriate authorities.

Assessments and inquiries may be initiated as a result of information from Council, members of Council or their staff, Accountability Officers, lobbyists, members of the public, or the media. The TLR may also initiate its own inquiries based on information from the Registry or other sources.

The Lobbying By-law provides enforcement measures to address non-compliance. The Investigations Unit reviews allegations fairly and impartially, and the Registrar takes enforcement action as necessary, ensuring that any penalties are proportionate and in the public interest. While the Investigations Unit's mandate includes protecting the public interest through inquiries, that interest is best served through preventing breaches before they occur. The TLR achieves this by:

- providing guidance to lobbyists and stakeholders before they communicate with POH
- maintaining a robust regulatory framework informed by precedent.
- monitoring the City's environment to identify emerging risks, activities, or events that could lead to violations.

This proactive approach enables the TLR to intervene strategically and minimize harm wherever possible.

Advanced Opinions and Advice

In 2024, the Investigations Unit issued a total of ten (10) advance opinions and provided over three hundred and five (305) consultations and/or pieces of advice to stakeholders.

Compliance Reviews

One of the TLR's core responsibilities is to promote transparency by ensuring that lobbyists provide timely, accurate, and complete information in the Lobbyist Registry. The Investigations Unit supports this mandate by conducting compliance reviews of lobbyists who fail to register, fail to update their registrations as required, or fail to correct information in a registration when requested by an Advisor. These reviews address issues such as late registrations or updates, incorrect municipal addresses in planning matters, misidentification of the public office holder (POH) lobbied, or false reports of interactions with POH.

The Lobbying By-law requires lobbyists to register before communicating with a public office holder and to report lobbying activities within three (3) business days of the communication. Failure to comply with these requirements is an offence under the *POA* and may result in a report to Council. However, the Registrar has discretion to accept a late registration or update in appropriate circumstances. Factors the Registrar may consider include:

- The registrant's prior compliance history;
- The registrant's knowledge or opportunity for knowledge of the Lobbyist Registry and By-law;
- Whether the registrant promptly complies with requests for information;
- Whether the registrant provides a reasonable excuse for the delay (e.g., illness or significant extenuating circumstances);
- Whether the registrant held an honest and reasonable but mistaken belief about the need to register;
- Whether accepting the late registration or update serves the public interest, including the Registry's transparency mandate.

The Lobbying By-law further requires lobbyists to provide factual, accurate, and non-misleading information in the Registry and to exercise due care in public communications. When deficiencies are identified, lobbyists are given a reasonable opportunity to correct their registrations before the matter escalates.

In 2024, this proactive compliance approach proved effective: all but one identified issue was resolved without the need for a formal inquiry by the Investigations Unit. This reflects a high level of cooperation and a shared commitment to compliance within the lobbying sector.

Inquiries & Investigations Statistics

The table below shows the source of requests for the eight (8) new investigations and five (5) new inquiries in 2024:

Source of Request for Inquiry

| Source of Request | New Investigations | New Inquiries |
|-----------------------------------|--------------------|---------------|
| Members of Council or their staff | 2 | 1 |
| City staff | 2 | 2 |
| Toronto Lobbyist Registrar | 3 | 1 |
| Other Accountability Offices | 1 | 1 |
| Members of the Public | 0 | 0 |

Investigations and Inquiries

| Investigations and Inquiries | 2024 |
|----------------------------------|------|
| Investigations (new) | 8 |
| (completed) | 8 |
| Inquiries (new) | 5 |
| Inquiries carried over from 2023 | 5 |
| (completed) | 8 |
| (carried over to 2024) | 2 |

Outcomes of Completed Investigations

| Outcomes of the Investigations | Completed Investigations |
|--------------------------------|--------------------------|
| Inquiries Files Opened | 5 |
| Early Resolution Stream | 3 |

Outcomes of Completed Inquiries

| Outcomes of the Inquires Completed | Completed Inquires |
|---|--------------------|
| Breach of the Lobbying By-law not substantiated | 8 |

Education and Outreach

Educating POH, lobbyists, and the public about the Lobbying By-law and the Lobbyist Registry remains one of the TLR's core responsibilities. Outreach and education are essential tools in promoting best practices, encouraging compliance, and supporting a strong culture of ethics and accountability at City Hall.

By providing clear guidance on the application of the Lobbying By-law, the Registrar helps stakeholders understand their obligations and the impact of their actions. These educational efforts are critical to ensuring that lobbying activities are conducted transparently and in the public interest.

The ongoing success of the Lobbying By-law is closely tied to the TLR's commitment to outreach. Promoting awareness and sharing knowledge widely are among the most effective ways to achieve transparency and strengthen compliance across the City.

Engaging Senior Leadership on Lobbying Transparency

The Registrar engaged senior City leadership through a series of fifteen (15) sessions designed to strengthen awareness and understanding of the Lobbying By-law at the highest levels of City government. These included fourteen (14) personalized briefings for individual senior executives and their teams, as well as one (1) dedicated onboarding session for the entire new senior management group. The sessions focused on best practices for identifying and managing lobbying activity in meetings, discussions, and decision-making processes. Participants received practical tools, references, and ongoing support from TLR staff.

The TLR also partnered with the Purchasing and Materials Management Divisions (PMMD) to attend, present and provide information at monthly orientation sessions. These information sessions are held to introduce potential new suppliers to the City's requirements for procurement. The TLR supported these sessions by providing information about lobbying regulations as they relate to purchasing. This knowledge for vendors, especially at the outset of their interactions with the city, exemplifies the value of collaborating with POH to ensure all our stakeholders have the information they need to comply with the Lobbying By-law. Working with PMMD, TLR staff participated in eleven (11) supplier information sessions on doing business with the City.

2024 Ward 15 Municipal By-Election

Council declared the office of Councillor for Ward 15, Don Valley West, vacant, and a by-election was held on November 4, 2024. To support transparency and ensure compliance with the Lobbying By-law during the by-election period, the TLR's Office implemented several proactive measures:

- Issued and distributed by-election-specific interpretation bulletins addressing lobbying and political activity.
- Dedicated resources to provide advance guidance and opinions to lobbyists, helping to prevent potential incidents of non-compliance.

Collaborative Efforts in Lobbying Regulation

The TLR regularly collaborates with lobbying regulators from other jurisdictions and actively participates in Canadian and International conferences and seminars to exchange strategies for effective lobbying regulation.

1. Lobbyist Registrars and Commissioner Network (LRCN)

From September 23rd to 25th, 2024, the Office of the Commissioner of Lobbying of Canada hosted the annual conference of the Lobbyists Registrars and Commissioners Network (LRCN) in Ottawa. The TLR Office attended this conference, along with other regulators responsible for enforcing lobbying laws, regulations, and policies at the federal, provincial, and municipal levels across Canada.

Following a traditional welcome from Elder Claudette Commanda and a greeting from Mayor Mark Sutcliffe, the lobbying regulators shared updates from their respective jurisdictions and explored areas of common ground. The members of the network also had an opportunity to meet with the Speaker of the House of Commons, The Honourable Greg Fergus.

In keeping with their ongoing commitment to share best practices regarding the regulations that govern lobbying, the Commissioners and Registrars discussed the range of thresholds for in-house lobbying registration in their respective federal, provincial, and municipal regimes and considered the merits of registration by default.

Members of the LRCN were joined virtually by the Organization for Economic Co-operation and Development's (OECD) Carissa Munro, Head of Policy and Partnerships, and Pauline Bertrand, Policy Analyst, Political Integrity who provided an overview of the OECD's 2024 Recommendations on Transparency and Integrity in Lobbying and Influence.

Officials from Public Safety Canada also briefed the network on the Foreign Influence Transparency and Accountability Act included in Bill C-70, along with its implications at the provincial, territorial and municipal levels.

The next annual LRCN conference is scheduled to be held in Saint Andrews, New Brunswick in the fall of 2025.

2. Council on Governmental Ethics Laws (COGEL)

From December 8th to 11th 2024, the Lobbyist Registrar participated in the 43rd Annual COGEL (the Council on Governmental Ethics Laws) Conference, joining experts from across Canada, the United States, and around the world to share insights on the latest developments in lobbying regulation. Since 2008, staff from the TLR's Office have regularly

taken part in this important conference, engaging with international colleagues and peers in government ethics and accountability.

COGEL is an international organization that brings together leaders in government ethics, freedom of information, elections, lobbying, and campaign finance. Its members include government agencies, educational institutions, law firms, corporations, and other organizations dedicated to advancing ethics in public service.

At this year's conference, the Registrar served as a panelist on "All Things Are Local: Transparency Strategies for Local Lobbying Activity." The panel explored the rapidly expanding field of local lobbying disclosure, highlighting how more jurisdictions are shining a light on efforts to influence municipal decision-makers and the decisions that most directly affect communities. Panelists discussed recent developments, emerging trends, and the challenges of achieving meaningful transparency at city hall.

Modernization of the Lobbyist Registry

As part of its regular state of good repair program, the TLR has initiated a multi-phase modernization of the Lobbyist Registry and its supporting systems. This initiative predates, but also directly addresses, City Council's 2024 direction to accelerate enhancements that would indicate when lobbyists are no longer active on a file.

The project scope includes improvements to the full suite of Registry systems:

- The public-facing registration registry,
- The internal application used by the TLR Office, and
- The Lobbyist Disclosure Site, which allows the public to search lobbying activity.

The project is being delivered in two phases in collaboration with City Clerk's IT:

- **Phase 1** (currently underway) focuses on the Lobbyist Disclosure Site. Upgrades will improve the user interface, introduce chronological communication logs, and clarify lobbyist status. This phase is expected to be completed in Q3, 2025.
- **Phase 2**, scheduled to begin in Q3, 2025, will modernize the core registration system. Enhancements will include functionality to allow lobbyists to specify the date on which they cease lobbying on a file—supporting greater transparency around active and inactive lobbying—and additional usability improvements for both public and internal users.

The project will also evaluate enhancements requested by the TLR and align with the City's Technology Services Division (TSD) architecture, ensuring compatibility, sustainability, and performance.

Key Project Benefits:

- Increased efficiency and effectiveness in processing registrations
- Improved system performance, accessibility, and user experience across platforms, including mobile and tablet
- Greater support for the TLR's mandate through an enhanced, searchable online record of lobbying activity
- Strengthened transparency and public trust through clearer reporting and accountability
- Reduction in registration and reporting delays and elimination of reliance on outdated systems

This modernization aligns with the City's strategic goals by improving operational effectiveness, customer service, and the openness and integrity of government. Full implementation is anticipated by the second quarter of 2026.

ADVICE AND RECOMMENDATIONS

In accordance with my mandate, I provide advice to City Council on lobbying matters and recommend enhancements to the Lobbying By-law. The matter set out below is a significant issue warranting consideration and action.

The Application of the Lobbying By-law to Advisory Bodies

This year, I am recommending that Council request the Lobbyist Registrar, in consultation with the City Manager and the City Solicitor, report back to Executive Committee on a potential amendment to the Lobbying By-law to clarify how it applies to participation in City-established roundtables, working groups, and advisory bodies.

Under the Lobbying By-law, individuals appointed to advisory bodies are considered POH only if they are appointed by Council, a Standing Committee, Community Council, or a local board (restricted definition). Advisory groups formed and appointed solely by City divisions do not meet this definition.

As a result:

- Division-appointed participants are not POH and must register as lobbyists if their communications fall within the By-law's definition of lobbying.
- Council-appointed participants are exempt from registration.
- This discrepancy creates inconsistency, confusion, and resistance from both divisions and participants.

City divisions frequently establish these bodies to engage stakeholders with specialized expertise, lived experience, or community knowledge to support the development of policies, programs, and services. In some cases, individuals participating in these forums—particularly those employed by or representing for-profit organizations—may fall within the definition of lobbying under the current Lobbying By-law, even when their participation is consultative, occurs at the City's request, and is part of a transparent process.

To support effective public consultation while maintaining the integrity and transparency of City decision-making, I am recommending that the report explore whether a limited exemption from the registration requirement should be considered in defined circumstances, such as where:

- The working group, roundtable, or advisory body is formally established by a City Division, the City Manager, or the Office of the Mayor;
- The participant is participating at the request of a city official, employee, or agency;

- The participant is not seeking specific benefits such as contracts, grants, or regulatory outcomes on behalf of their employer or client;
- The group has a clear written mandate;
- Membership is documented and publicly disclosed;
- Meetings are minuted, summarized, or otherwise documented through a report filed with Council or a standing committee, and such records are accessible to the public; and
- The exemption applies only to communications that occur within the meeting itself, not to private communications before or after.

This proposed amendment is intended to ensure that the Lobbying By-law continues to promote transparency and accountability while enabling inclusive and constructive stakeholder engagement in the City's work.

EXPERT ADVICE

Financial Information

TLR business, travel and PCard expenses are posted on the [Lobbyist Registrar's Expense Reports page](#) of the TLR website.

Each year, the TLR undergoes an external compliance audit as part of the City's annual attest audit. These audits are required under Chapter 3 of the Toronto Municipal Code to be conducted annually by independent auditors and are reported directly to Council. The external compliance audit reports for the 2023 were adopted by Council on July 24 and 25, 2024. The independent auditor found the TLR to be compliant with the City's financial policies, procedures and delegated authorities. The compliance audit for the year 2024 is not yet available.

Budget Summary

In accordance with the City of Toronto Act, 2006, of the Toronto Municipal Code, the Registrar submits the TLR Operating and Capital Budget requests directly to Budget Committee for consideration.

On February 14, 2024, the Mayor's proposed 2024 Operating Budget of \$1.381 million gross and net, and 2024-2033 Capital Plan of \$2.0 million in project estimates for the TLR were deemed adopted by City Council.

Contact Us



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