



REPORT FOR ACTION

Amending the Lobbying By-law Roundtables & Advisory Groups

Date: November 24, 2025

To: Executive Committee

From: Lobbyist Registrar

Wards: All

SUMMARY

It is recommended that a new section be added to Chapter 140 of the Toronto Municipal Code, Lobbying (the Lobbying By-law), to exempt communications that occur during structured meetings of roundtables, working groups, advisory committees, and similar bodies established by City divisions or the City Manager for the purpose of providing advice or input to staff.

The proposed addition addresses an inconsistency in the Lobbying By-law's application that arises from the distinction between advisory bodies appointed by Council (whose members are considered public office holders and exempt from registration) and those established solely by City staff (whose participants may be required to register as lobbyists). This discrepancy creates confusion and may discourage public engagement.

The proposed exemption is narrowly scoped and conditional, maintaining transparency and integrity while removing unnecessary barriers to stakeholder consultation.

RECOMMENDATIONS

The Lobbyist Registrar recommends that:

1. City Council amend § 140-5 of Municipal Code Chapter 140, Lobbying, by adding the following new provision:

§ 140-5K. Communications during City-established advisory or working bodies.

Communications that occur during meetings of a working group, roundtable, task force, advisory committee, or similar body established and convened by the City Manager or by a City division, for the purpose of providing advice or input to City staff or officials, provided that:

1. The body has a written mandate and was formally established before the meeting, as a multi-member group with a continuing advisory function;
2. Its mandate, membership, and meeting records identifying participants and summarizing subject matter discussed are publicly disclosed and accessible;
3. The participant is attending at the request of a city official, employee, or agency;
4. The participant does not use the meeting to seek, promote, or endorse contracts, grants, or other benefits for their employer or client; and
5. This exemption applies only to communications made during meetings convened under the body's mandate, not to private, serial, or follow-up communications before or after, or to individual or informal meetings described as advisory.

FINANCIAL IMPACT

This report has no financial impact.

DECISION HISTORY

City Council, at its meeting of July 23 and 24, 2025 (Item CC32.2), requested that the Lobbyist Registrar, in consultation with the City Manager and the City Solicitor, report back to the Executive Committee in the fourth quarter of 2025 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.

Section 140-33(9) of the Lobbying By-law provides that the Lobbyist Registrar is responsible for advising Council on lobbying matters and recommending improvements and amendments to the Lobbying By-law.

Section 3-1.6E of the Toronto Municipal Code requires an accountability officer to submit policy-related reports to Council through the Executive Committee.

COMMENTS

City divisions frequently establish advisory and consultative bodies to engage individuals and organizations with relevant expertise, lived experience, or community insight. These participants contribute to the development of City policies, programs, and services in a transparent, collaborative environment.

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

As a result:

- Division-appointed participants are not considered public office holders 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 creates inconsistency, confusion, and resistance among both City staff and external participants

In some cases, individuals participating in division-led advisory forums—especially those representing for-profit organizations—are required to register as lobbyists even when their participation is consultative, non-advocative, and occurs at the explicit request of City staff.

The proposed amendment creates a narrowly scoped exemption for communications that occur within the meetings of a formally established, City-led advisory or consultative body that meets clear public accountability standards. The exemption would apply only where:

- The body has been formally established and convened by a City division, the City Manager;
- Participation is at the City's request;
- No advocacy for contracts, grants, or other specific benefits is involved; and
- The body's mandate, membership, and meeting documentation are publicly disclosed and accessible.

The exemption would not apply to groups or meetings established by the Mayor or individual Members of Council, or to any informal or private discussions outside the formal meeting process.

The exemption would not apply to informal communications or communications occurring outside the structure of the advisory meeting. This ensures that the exemption cannot be used to circumvent the By-law's requirements while enabling meaningful and transparent stakeholder engagement.

I have consulted with the City Solicitor and City Manager in preparing these recommendations.

OPERATIONAL IMPLEMENTATION

The operational model for administering the posting and maintenance of advisory body information will be established by the City Manager, in consultation with the City Clerk and the Legal Services. This work is ongoing and will proceed following Council's consideration of the proposed exemption. The Toronto Lobbyist Registrar's Office will apply the exemption criteria once the corporate operational framework is in place.

With respect to training and guidance, the Toronto Lobbyist Registrar's Office will provide direction on the regulatory requirements associated with the exemption, specifically the transparency conditions that must be met, while operational training to support the public service regarding the disclosure of advisory body information will be implemented by the City Manager, in consultation with the City Clerk.

CONTACT

Stephen Littlejohn, Lobbyist Registrar

SIGNATURE



Stephen Littlejohn, Lobbyist Registrar