

2025

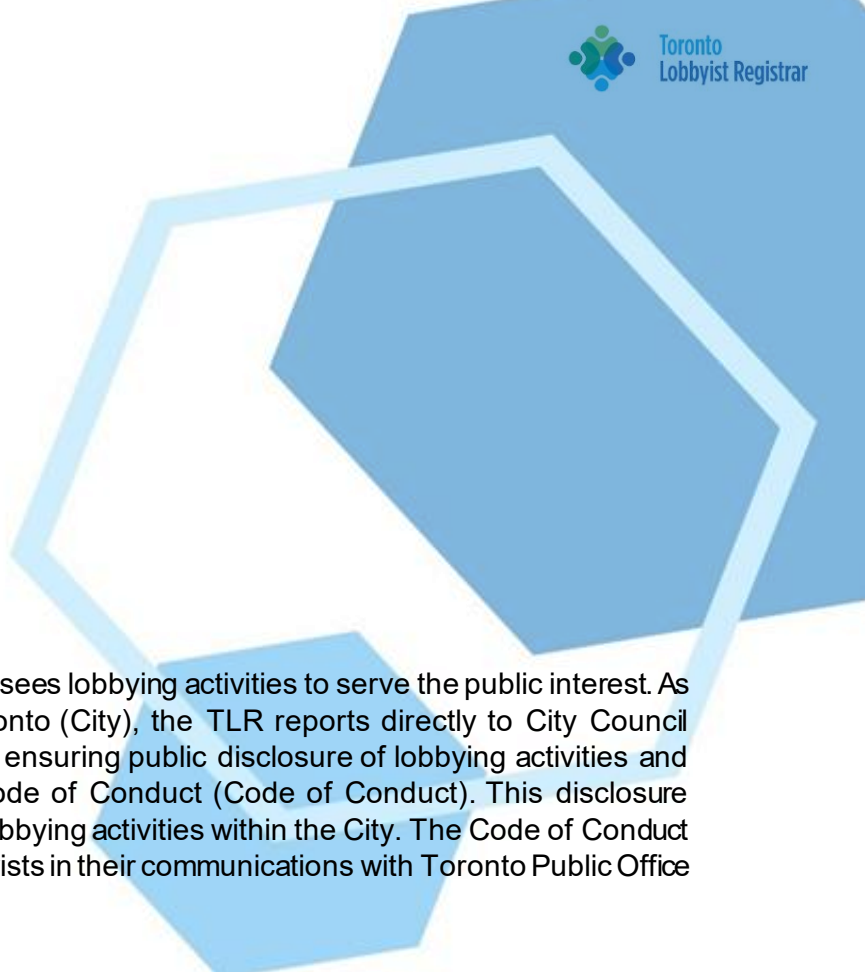
Annual Report



The Toronto Lobbyist Registrar 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 Toronto Lobbyist Registrar is committed to continually acting in support of and in solidarity with Black communities seeking freedom and reparative justice in light of the history and ongoing legacy of slavery that continues to impact Black communities in Canada. As part of this commitment, we would also like to acknowledge that not all people came to these lands as migrants and settlers. Specifically, we wish to acknowledge 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).



Toronto
Lobbyist



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Message from the Lobbyist Registrar



Dear Members of City Council and Citizens of Toronto,

I am pleased to present the 2025 Annual Report of the Toronto Lobbyist Registrar.

Transparency in municipal decision-making is essential to maintaining public confidence in government. The Toronto Lobbyist Registry plays an important role in supporting that confidence by providing residents with access to information about who is seeking to influence City decisions and on whose behalf.

Throughout 2025, the Toronto Lobbyist Registrar remained focused on supporting a lobbying framework that promotes transparency while enabling meaningful participation in municipal decision-making. This commitment was reflected in our outreach and education efforts, support for amendments to Chapter 140 of the Toronto Municipal Code, Lobbying (the Lobbying By-law), and ongoing work to improve the accessibility and effectiveness of the Lobbyist Registry.

Education and outreach continued to be a key priority. During the year, the Toronto Lobbyist Registrar Office delivered training and information sessions to City divisions, agencies, boards, and external stakeholders, while also providing guidance and advice to lobbyists, public office holders, members of the public, and the media. These efforts help foster a shared understanding of the requirements and objectives of Toronto's lobbying regime and support compliance with the Lobbying By-law.

A significant development in 2025 was City Council's adoption of amendments to the Lobbying By-law that clarify the application of the lobbying framework to communications occurring within certain City-established advisory and working groups. These amendments help ensure that the City's lobbying regime remains effective and responsive to evolving forms of public engagement while continuing to support transparency and public confidence in decision-making.

The Toronto Lobbyist Registrar Office also continued efforts to enhance the administration of the Lobbyist Registry and improve public access to information regarding lobbying activities. As Toronto's governance environment evolves, so too must the tools that support openness, accountability, and public trust.

I would like to thank City Council, public office holders, City staff, the lobbying community, and members of the public for their continued engagement with the work of the Toronto Lobbyist Registrar Office. Transparency is a shared responsibility, and the effectiveness of Toronto's lobbying framework depends upon the commitment of all those who participate in the City's decision-making processes.

As we look ahead, the Toronto Lobbyist Registrar will continue to promote transparency, support compliance with the Lobbying By-law, and strengthen public confidence in municipal government.

Respectfully submitted,

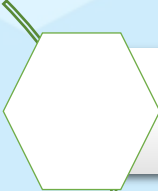
Stephen Littlejohn

Stephen Littlejohn
Lobbyist Registrar

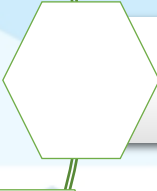
What we do at the Toronto Lobbyist Registrar

Our Core Mandate: the TLR 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 the Lobbying By-law.

What We Do



We accept confidential inquiries regarding potential violations, conduct investigations of alleged breaches and impose penalties where breaches are found.



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.

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 Registrar, outlined in accordance with 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 (Counsel) provide a full range of legal and investigative services in a senior role to the TLR Office, including advocacy, advice, and the provision of services on legal matters that are consistent with the Registrar's public interest mandate. They also collaborate with the Lobbyist Registry Advisors (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 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 Counsel to recommend appropriate actions, such as sanctions or enforcement measures, and contribute to the development of policies to strengthen regulatory frameworks.



TLR Team

Lobbyist Registry Advisors

The Advisors provide front-line customer service and advice to lobbyists regarding the registration process, and to public officers 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 Code of Conduct. The Advisors participate as members of the TLR Team in providing outreach and education, making improvements to the TLR's 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 Advisors.

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

Toronto
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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.

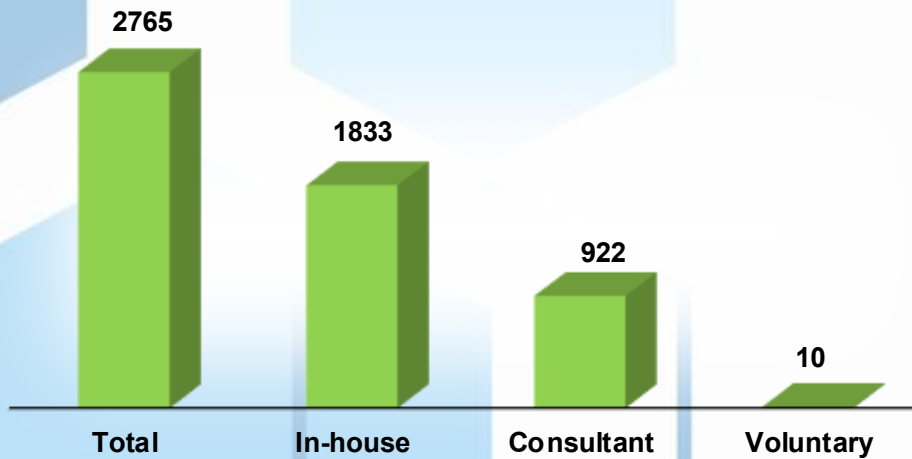
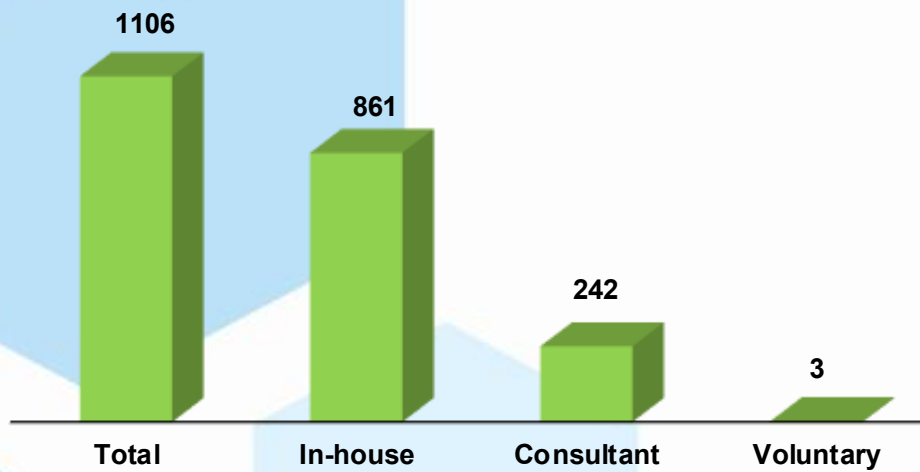
Within three business days of communicating with a POH about a registered subject matter, lobbyists must return to the registry system to disclose the POH's name, the communication methods used, and the date of communication.

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 2025, the Advisors processed two thousand seven hundred and eighty-five (2,785) lobbyists and ten thousand eight hundred and forty-seven (10,847) subject matter registration transactions.

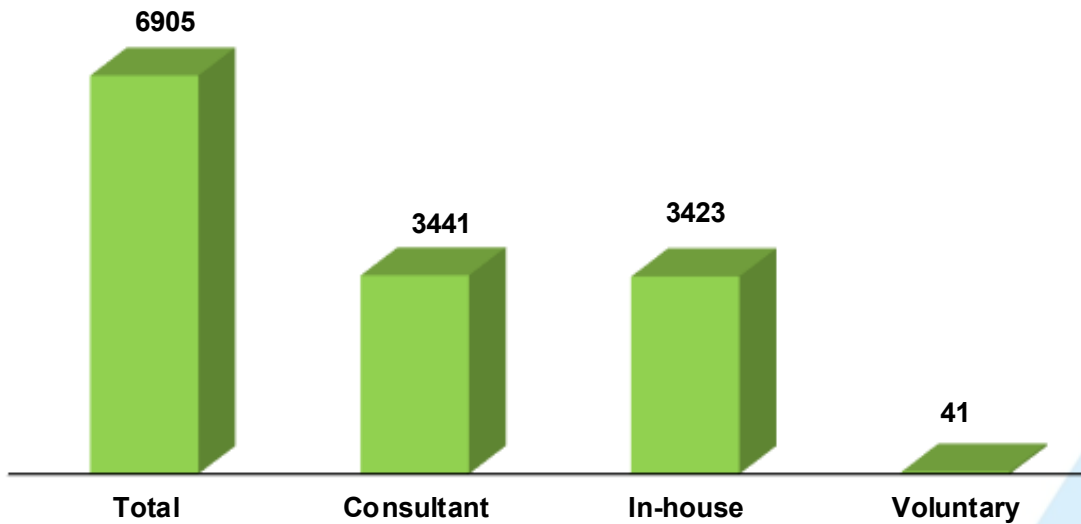
2025 in Focus: Key Registry Metrics

Lobbyist Registrations

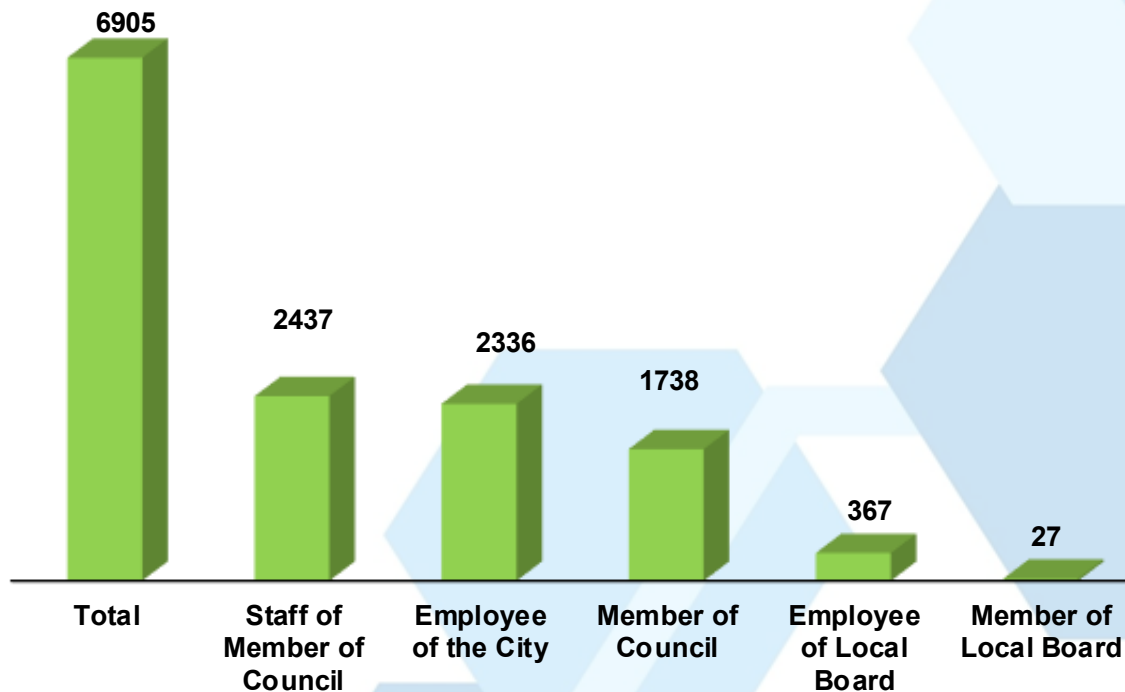
Subject Matter Registrations



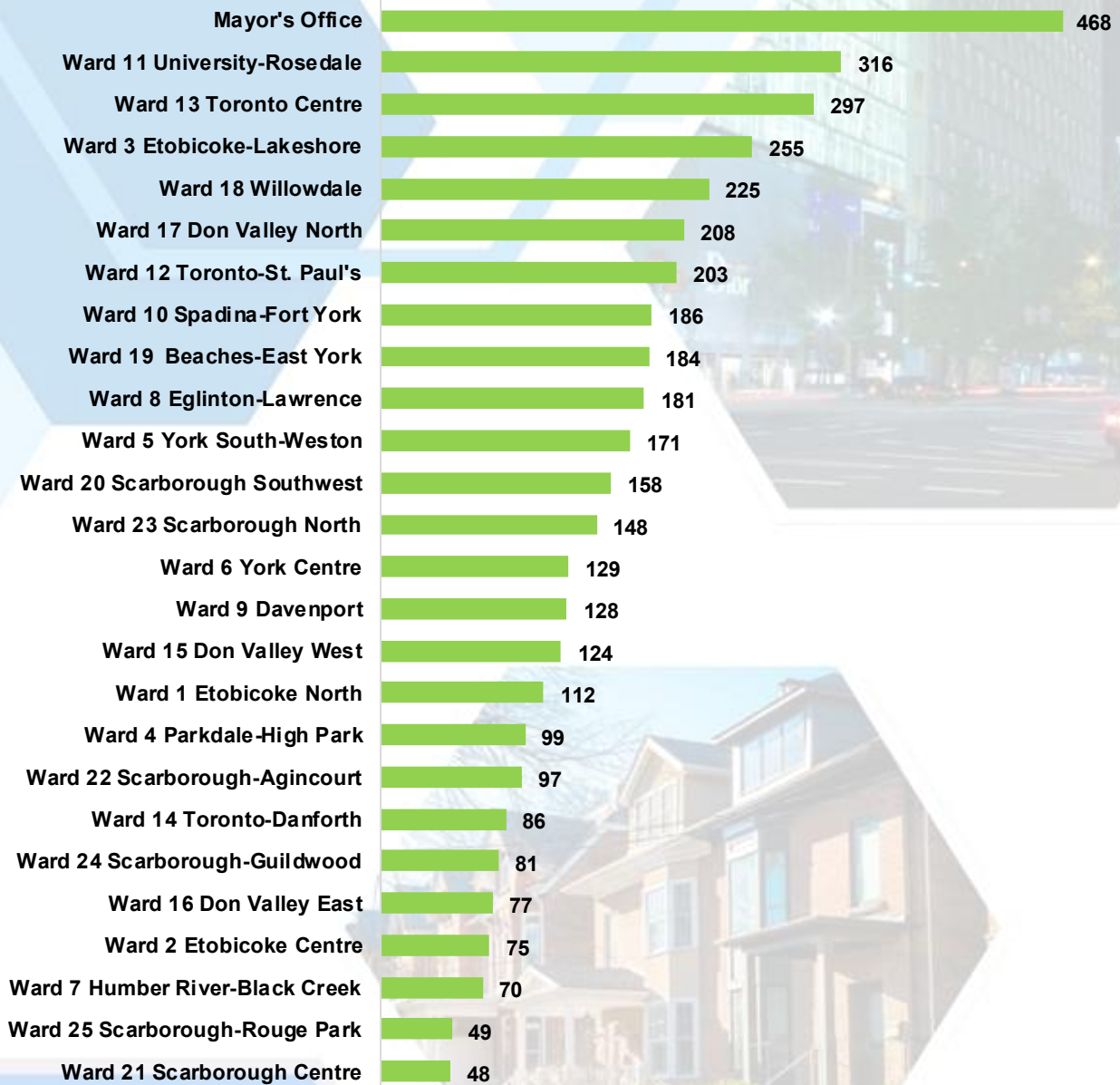
Lobbying Communications by Lobbyist Type



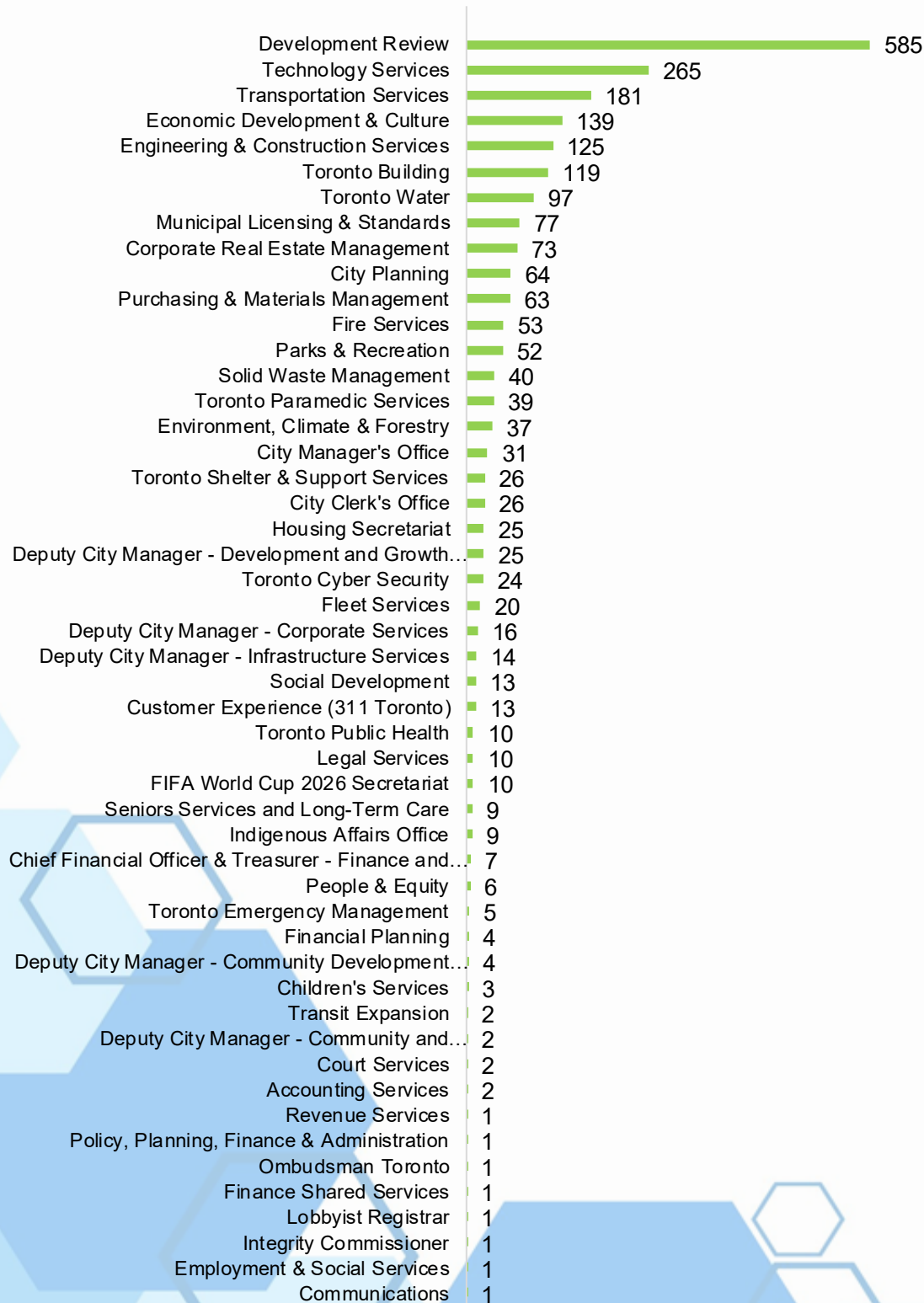
Lobbying Communications by Type of Public Office Holder Lobbied



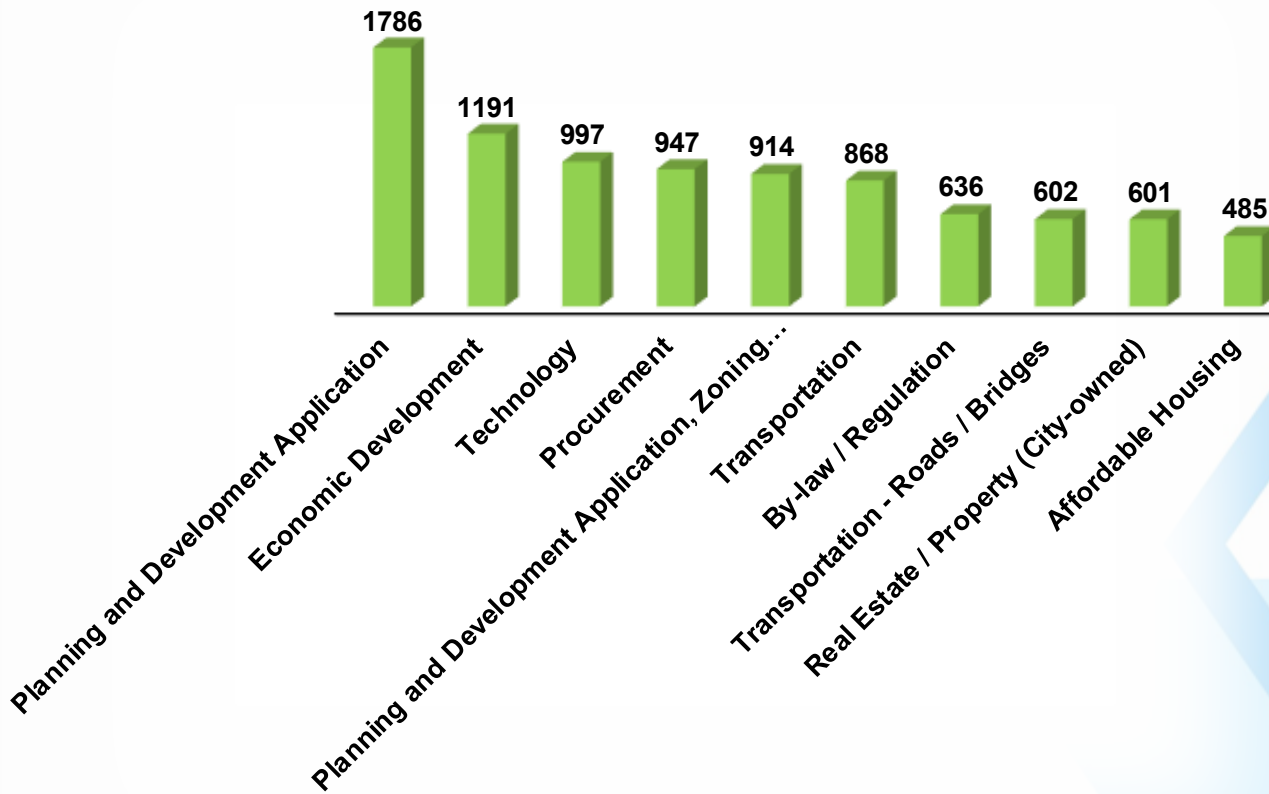
Lobbying Communications by Ward (Member of Council and Staff Member of Council)



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 reviewing potential contraventions of the Lobbying By-law and promoting compliance with the City's lobbying framework. Potential concerns may come to the TLR Office attention through complaints, referrals, information contained in the Lobbyist Registry, media reports, or the TLR Office own monitoring activities.

When a potential contravention is identified, the Inquiries and Investigations Unit first assesses the matter to determine whether further review is warranted. Many issues can be resolved through education, guidance, or corrective action. Where concerns cannot be addressed informally and there is evidence of a potential breach, the Registrar may authorize a formal inquiry.

All inquiries are conducted in accordance with COTA and the TLR Compliance Inquiries Procedures. The inquiry process is confidential and designed to ensure that matters are reviewed fairly, independently, and impartially.

While inquiries are an important accountability tool, the TLR Office primary objective is to prevent breaches before they occur. Through outreach, education, advance opinions, compliance reviews, and ongoing engagement with stakeholders, the TLR Office works to promote compliance and support transparency in municipal decision-making.

Advance Opinions and Advice

Providing timely guidance is one of the most effective ways to promote compliance with the Lobbying By-law. The TLR regularly provides advice to lobbyists, POH, City staff, members of the public, and other stakeholders regarding registration requirements and the application of the Lobbying By-law.

In 2025, the Inquiries and Investigations Unit issued five (5) advance opinions and provided more than two hundred and eighty (280) consultations and advisory responses. These interactions help stakeholders understand their obligations before lobbying activities occur and support the TLR Office objective of preventing breaches before they happen.

Compliance Reviews

The TLR promotes transparency by ensuring that information contained in the Lobbyist Registry is timely, accurate, and complete. To support this objective, the Inquiries and Investigations Unit conducts compliance reviews where there are concerns regarding registration requirements, reporting obligations, or the accuracy of information contained in the Registry.

Common issues reviewed by the TLR Office include late registrations, late updates, incorrect information relating to lobbying activities, and other administrative compliance concerns. In many cases, these matters can be resolved through education, guidance, and corrective action without the need for a formal inquiry.

The TLR Office compliance-first approach encourages cooperation and promotes transparency while ensuring that stakeholders have an opportunity to correct deficiencies where appropriate. Formal inquiries are generally reserved for matters involving more significant compliance concerns or circumstances where issues cannot be resolved through voluntary corrective action.

In 2025, one hundred percent (100%) compliance matters were resolved without the need for a formal inquiry, reflecting a strong commitment to compliance among participants in Toronto's lobbying regime.

Inquiries & Investigations Statistics

Eleven (11) new investigations and four (4) new inquiries were commenced in 2025.

Source of Request

Source of Request	New Investigations	New Inquiries
Toronto Lobbyist Registrar	8	1
Other Accountability Offices	2	2
Members of the Public	1	1

Investigations and Inquiries

Investigations and Inquiries	2025
Investigations (new)	11
(completed)	11
Inquiries (new)	4
Inquiries carried over from 2024	2
(completed)	1
(carried over to 2026)	5

Outcomes of Completed Investigations

Outcomes of the Investigations	Completed Investigations
Inquiries Files Opened	4
Early Resolution Stream	7

Outcomes of Completed Inquiries

Outcomes of the Inquires Completed	Completed Inquires
Breach of the Lobbying By-law not substantiated	1

Advice And Recommendations

One of the Registrar's responsibilities is to provide advice to Council regarding the administration and effectiveness of Toronto's lobbying framework.

In the 2024 Annual Report, I recommended that Council consider amendments to the Lobbying By-law to clarify its application to participation in certain City-established advisory bodies, working groups, and roundtables. In December 2025, City Council adopted amendments to the Lobbying By-law that addressed this recommendation and clarified the circumstances under which communications occurring within qualifying City-established advisory and working groups are exempt from registration requirements.

The adoption of these amendments reflects Council's ongoing commitment to ensuring that Toronto's lobbying framework remains effective, transparent, and responsive to evolving governance practices.

For 2026, I recommend that City Council request the Lobbyist Registrar, in consultation with the City Clerk and City Solicitor, to undertake a review of Schedule A (Exempted Municipal Level Corporations and Other Bodies), Schedule B (Exempted Employee and Labour Groups), and Schedule C (Crown Corporations or Controlled Corporations, Agencies) of the Lobbying By-law.

These schedules identify entities that are either included within or exempted from aspects of the lobbying framework. A comprehensive review of these schedules has not been undertaken since the Lobbying By-law was adopted in 2008. Since that time, a number of the entities listed have changed names, been restructured, amalgamated, dissolved, or otherwise ceased to exist. As a result, some schedules may no longer accurately reflect the current organizations to which the Lobbying By-law applies.

A comprehensive review would ensure that the schedules remain current, accurate, and reflective of the City's existing organizational and governance framework, while continuing to support the objectives of transparency, accountability, and clarity for lobbyists, POH, and members of the public.

The review would not presume that amendments are required. Rather, it would provide Council with an assessment of whether the schedules continue to operate as intended and identify any updates or technical amendments that may be warranted to ensure the schedules accurately reflect the current status of the entities they reference.

Education and Outreach

Educating POH, the public, and lobbyists about the Lobbying By-law and the Registry is one of the TLR's primary responsibilities. Encouraging adherence to the Registry and the Lobbying By-law is crucial for efficient regulation. Taking part in educational initiatives regarding the application of the Lobbying By-law promotes best practices and fosters a thriving ethical culture. To inform all our stakeholders of the implications of their actions regarding their obligations and requirements under the Lobbying By-law outreach and education are essential.

The effectiveness of the Lobbying By-law has been largely attributed to TLR's ongoing effort on outreach. Encouraging widespread knowledge exchange is the best way to achieve transparency and Lobbying By-law compliance.

Supporting Stakeholders and Public Office Holders

The TLR continued to engage proactively with City executives and senior management through targeted meetings focused on the practical administration of the Lobbying By-law. During the reporting period, the TLR Office met with senior leaders and their teams from several key City divisions and offices, including City Planning, Purchasing and Materials Management, Invest Toronto, and the Office of the Chief of Protocol and External Relations.

These sessions focused on the application of the Lobbying By-law within each division's operational context, including registration requirements, recent guidance issued by the TLR Office, and emerging or division-specific issues. Participants were also reminded of the TLR Office advisory role and encouraged to seek guidance whenever questions arise regarding the interpretation or application of the Lobbying By-law.

By engaging directly with City executives and their divisions, the TLR Office continues to promote transparency, consistency, and compliance while equipping senior public office holders with the knowledge needed to recognize lobbying activities and understand their responsibilities under the Lobbying By-law.

The TLR Office also continued its collaboration with the Purchasing and Materials Management Division (PMMD) by participating in its monthly Vendor Information Sessions: Doing Business with the City. These sessions introduce prospective vendors to the City's procurement processes and related compliance requirements. As part of this initiative, the TLR Office provided guidance on the application of the Lobbying By-law to procurement-related communications, helping vendors understand their obligations before engaging with City officials.

Working in partnership with PMMD, the TLR Office staff participated in eleven (11) Vendor Information Sessions during the reporting period. This collaborative, preventative approach helps ensure that vendors receive timely information about their lobbying obligations at the outset of their interactions with the city, supporting greater transparency and compliance throughout the procurement process.

2025 Ward 25 Municipal By-Election

Following Council's declaration of a vacancy in the office of Councillor for Ward 25, Scarborough–Rouge Park, a municipal by-election was held on September 29, 2025. To support transparency and promote compliance with the Lobbying By-Law, during the by-election period, the TLR undertook several proactive initiatives, including:

- Issuing and distributing by-election-specific interpretation bulletins addressing lobbying and political activities.
- Providing timely guidance and advisory opinions to lobbyists to promote compliance and help prevent potential breaches of the Lobbying By-law before they occurred.

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 Commissioners Network (LRCN)

In 2025, New Brunswick hosted the annual conference of the Lobbyists Registrars and Commissioners Network (LRCN) in Saint Andrews, New Brunswick. 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. Throughout the meeting the lobbying regulators shared updates from their respective jurisdictions and discussed commonalities and lessons learned. Attendees also exchanged information and techniques on reaching lobbyists who may not currently be aware of their obligations under their respective Acts.

Lobbyisme Québec presented their work to date exploring the possibilities offered by artificial intelligence to support the organization in achieving its mission and operations. Additional topics of discussion included cooling-off periods for officials, recent legal findings, and a more in-depth exploration of registration thresholds.

The network recently agreed to increase collaboration on a continuous basis. The Office of the Commissioner of Lobbying of Canada agreed to take on a secretariat function to coordinate logistics and the sharing of information. Further, the network agreed to work together between meetings to develop discussion papers on topics that have impacts across jurisdictions in Canada.

The regulators emphasized the importance of legislators prioritizing lobbying transparency and ethics. In many jurisdictions across Canada, legislative updates are needed. Several jurisdictions are expecting their legislation to be studied in the near future or are advocating for a legislative review. Regulators look forward to supporting legislators in enhancing transparency and supporting a healthy democracy. Members agreed that it is essential that legislators engage them in such legislative reviews and in the development of changes.

The next annual LRCN conference is scheduled to be held in Alberta in the fall of 2026.

2. Council on Government Ethics Laws (COGEL)

The TLR continued its membership in the Council on Governmental Ethics Laws (COGEL), an international organization dedicated to advancing government ethics, lobbying regulation, campaign finance, freedom of information, and elections administration. Through its membership, the TLR Office remains connected to developments and best practices in ethics and accountability from jurisdictions across Canada and internationally.

3. Elevate Festival 2025

On October 8, 2025, the TLR staff, in collaboration with Procurement and Materials Management, operated an informational booth at the Elevate Festival. Staff offered advice and policy interpretation to festival participants, creating a meaningful experience for entrepreneurs and small business owners eager to understand how to engage in business opportunities with the City.

The Elevate Festival is a premier gathering of tech leaders, creative innovators, and forward-looking thinkers. Its annual program showcases influential speakers who are tackling major societal issues while driving the innovations that will define the future.

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 2024 were adopted by Council on July 23 and 24, 2025. 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 2025 will be on the City Council agenda for July 29, 30 and 31, 2026 Council meeting.

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 11, 2025, the Mayor's proposed 2025 Operating Budget of \$ 1.420 million gross and net, and 2025-2034 Budget and Capital Plan of \$1.730 million for the TLR were deemed adopted by City Council. An adjustment of \$0.017 million was approved in-year, increasing the 2025 Operating Budget to \$1.437 million gross and net.

Contact Us

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