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# Lobbying During the Election Period

## 2026 Municipal Election Bulletin

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### Purpose

This Bulletin provides guidance to lobbyists regarding their roles and obligations during the 2026 municipal election cycle. It addresses questions that may arise before and during the election period, identifies potential conflicts of interest and risks of undue influence, and supports compliance with the Toronto Municipal Code Chapter 140, Lobbying (the Lobbying By-law).

### Election Day is October 26, 2026

### Campaign Period and Election Period

This section provides general context regarding the timing of municipal election activities.

Under the *Municipal Elections Act, 1996* (the Municipal Elections Act), a candidate’s “**campaign period**” begins on the day the candidate files a nomination paper with the City Clerk. The campaign period generally ends on December 31 of the election year, unless it is terminated earlier or extended in accordance with that Act.

For the 2026 municipal election:

- The first day nominations may be filed is May 1, 2026.
- Election Day is Monday, October 26, 2026.

The campaign period is candidate-specific and begins only once a nomination has been filed.

For the purposes of this Bulletin, “**election period**” refers to **May 1, 2026, to October 26, 2026 (Election Day)**. This is not a defined term under the *Municipal Elections Act, 1996*, but is used for interpretive guidance to describe the period during which municipal election campaigning typically occurs.

The Lobbying By-law continues to apply in full throughout both the campaign period and the election period.

Nothing in this Bulletin modifies or replaces obligations under the Municipal Elections Act. Questions respecting election rules should be directed to the City Clerk’s Office – Toronto Elections.

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### Guidance

#### 1. Status of Members of Council During the Election Period

During the election period and until the end of the current term of Council:

- City Council continues to meet,
- Members of Council continue to hold office; and
- Members remain public office holders<sup>1</sup>, whether or not they are seeking re-election.

Accordingly, the Lobbying By-law continues to apply in full.

Lobbyists must:

- Register before lobbying a public office holder; and
- Report lobbying communications in accordance with the By-law.

The fact that a member is campaigning does not alter their status as a public office holder.

#### 2. Campaign Contributions

Campaign contributions in municipal elections are governed by the Municipal Elections Act. Questions respecting eligibility to contribute or contribution limits should be directed to the City Clerk's Office – Toronto Elections.<sup>2</sup>

Lobbyists may make political contributions in their personal capacity as eligible individuals, in accordance with the Municipal Elections Act.

However, under the Lobbying By-law, lobbyists must ensure that their political activities do not create an actual or apparent conflict of interest or give rise to a perception of undue influence.

Lobbyists should not:

- Make political contributions as part of their lobbying activities;
- Make contributions on behalf of a client, employer, corporation, or organization; or
- Use corporate or organizational resources to support a candidate.

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<sup>1</sup> "Public office holder" has the meaning set out in s. 156 of the *City of Toronto Act, 2006* and incorporated into § 140-1 of Toronto Municipal Code, Chapter 140, Lobbying (definition of "public office holder").

<sup>2</sup> For more information about individual contributions, see the City's Elections website, [www.toronto.ca/elections](http://www.toronto.ca/elections).

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Participation in campaign fundraising activities may create an actual or apparent conflict of interest or give rise to a perception of undue influence in relation to lobbying activities.

In assessing campaign-related activities, the Registrar may consider the surrounding circumstances, including whether fundraising or contribution activity is linked to lobbying objectives or ongoing lobbying activities.

### 3. Continued Application of the Lobbyists' Code of Conduct

The Lobbyists' Code of Conduct continues to apply throughout the campaign period and the broader election period.

#### Gifts, Benefits and Hospitality

The prohibition on entertainment, gifts, meals, trips and favours continues to apply throughout the campaign period and the broader election period.

For clarity, this includes access to high-demand or high-profile events hosted in Toronto. The prohibition applies regardless of how the benefit is structured or described and captures tickets, corporate hospitality, premium seating, access passes, upgrades, or related event benefits financed or arranged by a third party.

**See: *Entertainment, Gifts and Benefits — Prohibition Guidance.***

#### Other Prohibited Conduct Under the Code

The Code also prohibits lobbying in a form or manner that includes:

- Requesting public office holders to endorse or recommend a lobbyist's services;
- Lobbying at a charitable event, community or civic event, or similar public gathering.

These prohibitions apply to lobbyists, clients of a lobbyist, and any parent, subsidiary, affiliate, officer or employee of a lobbyist or client of a lobbyist.

### 4. Conflict of Interest and Improper Influence

Lobbyists must not place public office holders in a conflict of interest or in breach of their codes of conduct or standards of behaviour; and they must not bestow an improper benefit or exert improper influence on a public office holder.<sup>3</sup>

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<sup>3</sup> §§ 140-42 and 140-45 of the Lobbying By-law.

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A conflict of interest includes any interest, relationship, association, or activity that is incompatible, or may reasonably be perceived as incompatible, with the duties of the public office holder, including the duty to act in the public interest, whether real or apparent.

As noted in the Toronto Computer Leasing Inquiry and the Toronto External Contracts Inquiry (the “Bellamy Inquiry”), a conflict of interest is essentially a conflict between public and private interests, arising where personal interests may affect, or appear to affect, the impartial exercise of public duties.<sup>4</sup>

Lobbyists should take all necessary measures during the election period to avoid creating any actual or apparent incompatibility between a public office holder’s personal interests or obligations and their public duties, including the duty to act in the public interest.

### 5. Campaign Activities and Risk Considerations

Certain activities with respect to a municipal election campaign may place a public office holder in a conflict of interest or create a perception of undue influence.

These may include:

- Hosting or organizing fundraising events,
- Soliciting or bundling contributions,
- Serving in senior or strategic campaign roles; or
- Providing campaign advice while actively lobbying City matters.

Lobbyists are responsible for assessing the compliance risks associated with such activities in advance.

Heightened political sensitivity during the election period increases the risk of perceived preferential access or influence.

### Compliance Reminders

- Registration must occur before lobbying.
- Reporting deadlines continue to apply during the campaign and election period.
- The election does not alter the definition of lobbying.
- Transparency obligations remain unchanged.

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<sup>4</sup> See *Toronto Computer Leasing Inquiry and Toronto External Contracts Inquiry, Report*, Vol. 2, **Good Government** (2005), pp. 38–39. See also *Lobbyist Registrar for the City of Toronto, Report to Council on an Inquiry into Placing Members of Council in an Apparent Conflict of Interest* (23 March 2015), pp. 6–14.

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**Maintaining public confidence in the integrity of City decision-making is particularly important during an election cycle.**

### FAQs – Frequently Asked Questions

**Q. I am a registered lobbyist. May I also register as a candidate in Toronto’s municipal elections?**

**A.** The Lobbying By-law does not prohibit a lobbyist from registering as a candidate in an election. As a lobbyist, you must comply with the Lobbying By-law’s registration and reporting requirements, and the Lobbyists’ Code of Conduct (Article VI of the Lobbying By-law).

You should seek advice from the Lobbyist Registrar on any specific questions you have about your role as a lobbyist who is also a candidate.

If elected, you would become a public office holder for the purposes of Chapter 140 and would no longer be eligible to act as a lobbyist while holding office. The Lobbying By-law regulates communications between lobbyists and public office holders; these roles are distinct and cannot be exercised simultaneously in the same capacity.

**Q. I am a registered lobbyist or a client of a lobbyist. May I vote, place a campaign sign on my lawn or scrutineer for a candidate in Toronto’s municipal elections? What restrictions on lobbying will then apply to me, if any, during the election period or should the candidate get elected?**

**A.** These activities are permitted. If you lobby a candidate who is a sitting member of Council during the campaign period, you must comply with the Lobbying By-law. If the candidate is elected, any subsequent lobbying must also comply with the Lobbying By-law.

**Q. I am a registered lobbyist. May I contribute to the election campaign of a councillor who is running for re-election?**

**A.** Yes. Lobbyists may make campaign contributions in their personal capacity if they are eligible to do so under the Municipal Elections Act. Questions regarding eligibility to contribute or applicable contribution limits should be directed to the City Clerk’s Office – Toronto Elections.

A lawful political contribution, by itself, does not constitute lobbying under the Lobbying By-law. However, contributions must not be made as part of lobbying activities or in connection with lobbying objectives.

Lobbyists must ensure that their political activities do not create an actual or apparent conflict of interest or give rise to a perception of undue influence under the Lobbyists’ Code of Conduct.

Campaign contributions must be made in a personal capacity and not as part of professional lobbying activities.

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**Q. I am a lobbyist or a client of a lobbyist. May I volunteer to work on a candidate's election campaign? Will I be able to lobby the candidate if he or she is successful in the election?**

**A.** Yes. However, your volunteer work must comply with the Lobbying By-law. If you perform a significant role during the campaign, your activities pose a risk of creating a conflict of interest for the individual seeking to be a councillor should they be elected or re-elected.

For example, serving as the campaign chair, treasurer, fundraising manager or in another strategic role on a campaign team or leading the preparation of a candidate for debates or providing strategic advice in the context of debate preparation will create, at minimum, a perception of actual or apparent conflict of interest or undue influence.

Where such circumstances exist, subsequent lobbying of that individual or their staff may place the public office holder in an actual or apparent conflict of interest and may therefore be incompatible with the Lobbyists' Code of Conduct.

In most instances, a lobbyist who has undertaken significant campaign roles will not be permitted to lobby the successful candidate and their staff for the duration of that term of office, unless the Registrar determines that a shorter restriction period is appropriate based on the nature and extent of the campaign involvement.

You should seek the advice of the Lobbyist Registrar regarding whether your volunteer work and your individual circumstances are likely to result in a conflict of interest or undue influence.

**Q. May I buy a ticket for a political fundraising function?**

**A.** Yes, if you are an individual living in Ontario and this amount will not result in you exceeding the contribution limits under the Municipal Elections Act, as noted above. You must comply with the Lobbying By-law. You must not buy the ticket as a form of lobbying. The purchase of a ticket does not create an entitlement to future access or favourable treatment.

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### **Q. May I fundraise for a candidate? If I do, will I be able to lobby that candidate if he or she is successful?**

**A.** Fundraising by a lobbyist for a candidate whom the lobbyist lobbies or intends to lobby creates a significant risk of actual or apparent conflict of interest under the Lobbyists' Code of Conduct.

Justice Bellamy recommended:

113. Professional lobbyists should not engage in political fundraising for candidates or councillors they lobby, beyond making their own allowable donations.
114. When registering, lobbyists should certify that they have not engaged in political fundraising beyond making their own allowable donations.

Consistent with those principles, lobbyists are strongly advised not to fundraise for a candidate whom they lobby or intend to lobby. Where a lobbyist has engaged in fundraising activity for a candidate, the ability to subsequently lobby that individual once elected may be impaired or restricted under the Lobbyists' Code of Conduct.

In assessing fundraising activity, the Registrar may consider relevant factors, including but not limited to:

- Whether contributions were bundled;
- Whether the fundraising activity was linked to lobbying objectives; and
- Whether the lobbyist was actively lobbying the candidate at the time.

Lobbyists are encouraged to seek advice from the Lobbyist Registrar regarding their specific circumstances.

### **Q. May I invite a sitting member of Council who is a candidate to a sporting or cultural event during the election campaign?**

**A.** No. Under the Lobbyists' Code of Conduct, lobbyists are prohibited from offering or providing gifts, benefits, entertainment, tickets, hospitality, premium seating, upgrades, or similar advantages to a public office holder.

A sitting member of Council remains a public office holder while seeking re-election. Accordingly, the prohibition applies throughout the election campaign and continues if the member is re-elected. The election period does not create an exception to the prohibition on gifts or benefits.

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### Q. May an organization that lobbies hold an all candidates meeting or a similar election event?

A. Yes. A publicly advertised all-candidates debate that is open to the public and conducted in a neutral manner will not ordinarily constitute lobbying.

However, the facts of each event will determine whether registration or reporting obligations arise under Chapter 140. An organization may be required to register and report communications associated with the event where the circumstances involve lobbying activity.<sup>5</sup>

Relevant considerations include whether:

1. The event organizer is registered to lobby on matters that may come before the current Council and those matters are discussed at the event;
2. The invited candidates include sitting members of Council who are public office holders at the time of the event;
3. The event provides selective or preferential access to certain candidates or public office holders; or
4. The event is not open to the public and attendance is restricted, curated, or ticketed.

Organizations should assess the nature, structure, and purpose of the event in advance and seek guidance where uncertainty exists.

### Questions

If you are uncertain whether an activity may engage the Lobbying By-law, seek guidance before proceeding.

Website: [www.toronto.ca/lobbying](http://www.toronto.ca/lobbying)

Email: [lobbyistregistrar@toronto.ca](mailto:lobbyistregistrar@toronto.ca)

Telephone: 416-338-5858

### Authority

This guidance is issued pursuant to the Lobbyist Registrar's authority under Chapter 140 of the Toronto Municipal Code and Part V of the *City of Toronto Act, 2006* to interpret and administer the Lobbying By-law.

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<sup>5</sup> Lobbyist Registrar for the City of Toronto, [Report to Toronto City Council on an Inquiry: Lobbying at an Election Event](#) (3 April 2012).

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This Bulletin provides general interpretive guidance. It does not amend the By-law and is not a substitute for the legislation. The application of the Lobbying By-law and the Lobbyists' Code of Conduct depends on the specific facts of each case.

Lobbyists and other stakeholders are encouraged to seek advice from the Lobbyist Registrar regarding their specific circumstances.

### Related Guidance

Lobbyists and Third Party Advertising – 2026 Municipal Election Bulletin

Lobbying During the Election Transition Period – 2026 Municipal Election Bulletin

Entertainment, Gifts and Benefits — Prohibition Guidance

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