
Lobbying During the Election Transition Period 2026 Municipal Election

Purpose

This Bulletin provides guidance to lobbyists regarding their obligations under Toronto Municipal Code, Chapter 140, Lobbying (the Lobbying By-law) during the period between:

- Election Day (October 26, 2026); and
- Commencement of the new Council term (November 15, 2026).

This Bulletin distinguishes between:

- Newly elected members of Council.
- Re-elected members of Council.
- Members who were not re-elected.

Definitions (For the Purposes of this Bulletin)

Transition Period

The period beginning **October 26, 2026 (Election Day)** and ending **November 14, 2026, at 11:59 p.m.**

New Members

Individuals elected on October 26, 2026, who did not hold office immediately prior to Election Day.

Returning Members

Members of Council who were re-elected and who held office immediately prior to Election Day.

Members Not Re-Elected

Members of Council who held office prior to Election Day but were not re-elected.

Legislative Framework

The status of members during the transition period is governed by provincial legislation.

Municipal Elections Act, 1996

- **Section 6(1):** The term of office of members of Council begins on November 15 in the year of a regular election.
- **Section 6(3):** Members continue to hold office until their successors are elected and the newly elected council is organized.

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City of Toronto Act, 2006

- The definition of “public office holder” incorporated into the Lobbying By-law includes members of Council.
- **Section 186:** A member must take the prescribed declaration of office before taking a seat or conducting business.

Election results alone do not change a member’s legal status for the purposes of the Lobbying By-law.

Guidance

Status Of Council Members During the Transition Period

1. Newly Elected Members (“New Members”)

New members:

- Become members of Council on **November 15, 2026**; and
- **Are not public office holders** for the purposes of the Lobbying By-law until their term begins.

Registration Requirement

Communications that occur solely with new members between October 26 and November 14 are **not subject to the Lobbying By-law**.

However, consistent with the principles of transparency and public confidence underlying the Lobbying By-law, lobbyists are strongly encouraged to avoid seeking to advance lobbying matters with new members before they assume office.

2. Re-Elected Members (“Returning Members”)

Returning members:

- Continue to hold office without interruption;
- Remain members of Council throughout the transition period; and
- **Remain public office holders** for the purposes of the Lobbying By-law.

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Registration Requirement

Lobbyists must register and report qualifying communications with returning members during the transition period.

3. Members Not Re-Elected

Members not re-elected:

- Continue to hold office until November 14, 2026, at 11:59 p.m.;
- Remain members of Council until the end of the term; and
- Remain public office holders during the transition period.

Registration Requirement

Lobbyists must register and report qualifying communications with these members during the transition period.

PRACTICAL GUIDANCE FOR LOBBYISTS

October 26 – November 14, 2026

During the transition period:

- Communications with **returning members** - Registration required (if otherwise qualifying).
- Communications with **members not re-elected** - Registration required (if otherwise qualifying).
- Communications solely with **new members** - Not subject to the Lobbying By-law.
- Communications involving **City staff or other public office holders** - Registration required (if otherwise qualifying).

November 15, 2026, and After

As of November 15:

- New members are public office holders.
- Any qualifying communication occurring on or after this date must be registered.
- Discussions begun during the transition period that continue after November 15 may trigger registration obligations.

The requirement to take the declaration of office under section 186 of the City of Toronto Act, 2006 does not delay the statutory commencement of a member's term of office for lobbying purposes.

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Compliance Reminders

- The Lobbying By-law does **not** require proof of influence.
- A qualifying communication about a listed subject matter is sufficient to trigger registration obligations.

Questions

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

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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.

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

Lobbying During the Election Period – 2026 Municipal Election Bulletin

Lobbyists and Third Party Advertising – 2026 Municipal Election Bulletin

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Notes:	This bulletin only applies to the 2026 Municipal Election.