

# Staff Report



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To	<b>Committee of the Whole</b>
Service Area	Corporate Services
Date	Wednesday, July 3, 2024
Subject	<b>Lobbyist Registry By-law</b>

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## Recommendation

1. That the Lobbyist Registry By-law, included as Attachment-1 to report 2024-294, dated July 3, 2024, be approved.
  2. That the Lobbyist Code of Conduct, included as Attachment-2 to report 2024-294, dated July 3, 2024, be approved.
  3. That Suzanne Craig be appointed as the City of Guelph Lobbyist Registrar.
  4. That the Mayor and City Clerk be authorized to execute an agreement to contract the services of Suzanne Craig to act as the City of Guelph Lobbyist Registrar.
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## Executive Summary

### Purpose of Report

On April 16, 2024, City Council received a report titled [Lobbyist Registry Review – 2024-108](#) and directed the City Clerk to draft a Lobbyist Registry By-law (Registry By-law) and a Lobbyist Code of Conduct, as well as to recommend the appointment of a Lobbyist Registrar (Registrar), for City Council’s consideration. The purpose of this report is to present a Registry By-law and Lobbyist Code of Conduct to City Council for approval, as well as to appoint a Registrar. The proposed Registry By-law is included as Attachment-1. The proposed Lobbyist Code of Conduct is included as Attachment-2.

### Key Findings

A Lobbyist Registry (Registry) is a useful tool for promoting transparency and trust in local government. It provides a public record of individuals engaged in lobbying, including who they represent, who they lobby, and the issues they advocate for. This transparency allows the public to understand the relationship between lobbyists and policymakers. A Registry does not prohibit, minimize or reduce the effectiveness of lobbying and it places no limits on the amount or type of lobbying that can take place.

Following City Council in April, staff conducted stakeholder engagement with the for-profit and not-for-profit sectors. That engagement led to several specific changes in the proposed Registry By-law. In most areas, however, the specifics of the proposed Registry By-law match what was presented to City Council in April.

The effective date of the Lobbyist Registry By-law has been moved from September 1, 2024 to October 1, 2024 to allow additional time for City staff to build the Registry in-house. Building the Registry in-house gives the City greater control over its functionality and saves tens of thousands of dollars versus procuring a third-party tool. While the Registry By-law will come into force on October 1, enforcement provisions will not be in effect until January 1, 2025. This gives members of the public, lobbyists and public office holders (office holders) time to become aware of and fully understand the Registry By-law before any penalties could be applied for non-compliance. Following City Council's approval, a rigorous communications and education campaign will take place, beginning in September 2024 and running to Q1, 2025, to give all stakeholders the opportunity to fully understand any commitments they have under the Registry By-law.

Municipal Lobbyist Registries are enforced by Lobbyists Registrars. The Registrar is an independent officer of City Council, similar to the Integrity Commissioner. City staff are recommending the appointment of [Suzanne Craig](#) as the City of Guelph Registrar.

### **Strategic Plan Alignment**

The establishment of a Registry in Guelph will increase the accountability of elected officials and senior City staff, in keeping with the lead with accountability objective of the Future Guelph Strategic Plan.

### **Future Guelph Theme**

Foundations

### **Future Guelph Objectives**

Foundations: Lead with accountability

### **Financial Implications**

There are no new or additional costs associated with building or maintaining a Registry, but the work of the Registrar will require additional funding. The Registrar will invoice the City for services rendered, similar to the Integrity Commissioner. The total annual costs associated with this work are estimated to be \$10,000 to \$20,000. This budget impact will be monitored in the first two years of implementation. Following implementation and monitoring in 2025 and 2026, the continuance of a Registry will be subject to permanent budget approval.

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## **Report**

The [Municipal Act grants municipalities the authority to create a Registry and appoint a Registrar](#). A Registry is not mandatory, although if implemented several statutory requirements apply. On April 16, 2024, City Council passed the following resolution directing staff to prepare a Registry By-law and a Lobbyist Code of Conduct for approval by City Council:

That the City Clerk be directed to draft a Lobbyist Registry By-law and Lobbyist Registry Code of Conduct, consistent with the details of report 2024-108 dated April 3, 2024, and report back to Council in Q3 2024.

The proposed Registry By-law, included as Attachment-1, is largely the same as was outlined in [Lobbyist Registry Review](#) report presented in April. This report focuses on answering questions raised by City Council in April and incorporating

feedback received from community stakeholders. The 'General Information Regarding Guelph's Proposed Lobbyist Registry' section at the end of this report includes general information about the Registry that was communicated to City Council in April, as a means of ensuring that all of the relevant information regarding the proposed Registry By-law is available in one place.

## **Responses to Questions Raised by City Council and Community Stakeholders**

Members of City Council asked specific questions about the applicability of the Registry By-law to not-for-profits, the ability of expanding the scope of lobbying to include activities where there is no financial interest and the possibility and appropriateness of monetary penalties for contraventions.

### **The lobbyist registry should not be expanded to cover communication not connected to a financial interest.**

The definition of lobbying that was included in previous staff reporting was as follows:

Any communication with an office holder by an individual who is paid or represents a business or financial interest with the goal of influencing any legislative action including development, introduction, approval, defeat, amendment or repeal of a by-law, motion, resolution or other decision before City Council, a committee of City Council, an Advisory Committee of Council (ACOC) or a member of staff acting under delegated or statutory authority.

Following feedback from City Council and community stakeholders, the definition of lobbying in the proposed Lobbyist Registry By-law removes business interest but leaves in place financial interest as follows:

Any communication with a public office holder by an individual who is paid or represents a financial interest with the goal of influencing any legislative action including development, introduction, approval, defeat, amendment or repeal of a by-law, motion, resolution or other decision before City Council, a committee of City Council, an ACOC or a member of staff acting under delegated or statutory authority.

Business interest was removed from the definition following meetings with stakeholders for two reasons. The first is to provide clarity and simplify the definition. As discussed throughout this report, stakeholders indicated that simplicity and ease of understanding was critical for the success of the Registry. The second is to ensure that the Registry By-law remains agnostic regarding for-profit and not-for-profit organizations. The inclusion of business interest in the definition would likely have resulted in the activities of for-profit businesses being treated differently than not-for-profits. That's not the intention of the Registry By-law and the definition has been amended to reflect this change.

In April, City Council asked staff to consider ways to expand the definition of lobbying to include communication with office holders that is not connected to a financial interest. There are no comparator municipalities in Ontario that have lobbyist registries disconnected from the financial interest of a lobbyist. The Federal and Provincial Lobbyist Registries do not include a financial interest requirement directly, instead they use a definition of lobbying that includes only those who are paid to lobby (either in-house or as a consultant) and who spend a specific number

of hours per year engaged in lobbying work. Guelph's proposed Registry By-law is consistent with comparator municipal registries in Ontario and goes slightly further than the Provincial and Federal Lobbyist Registries by applying to anyone who has communicated with an office holder and has a financial interest in the policy outcome being pursued. The Provincial and Federal Lobbyist Registries, while not connected to a financial interest, are, however, significantly more complicated for lobbyists and require that organizations track the amount of time they spend lobbying. That is not something staff believe would be in the public interest for Guelph as it places a significant administrative burden on lobbyists and the organizations they represent.

For these reasons, City staff do not recommend broadening the definition of lobbying, but should City Council wish to expand the definition to include communications with office holders where the lobbyist has no financial interest, the following amendment to staff recommendation number one could be moved:

That the Lobbyist Registry By-law be amended to remove financial interest from the definition of lobbying and that the exemptions from lobbying for residents communicating with public office holders on matters of routine constituency/community issues be strengthened.

Should the amendment above be approved, any communication with an office holder that is not a routine constituency/community issue would qualify as lobbying. This would cast a significantly wider net in the community and, in staff's opinion, limit the reasonable access that all residents should have to elected officials and senior City staff. A Registry which inhibits a resident or groups of residents from speaking to staff or an elected official about community issues like traffic calming, waste collection, etc. is not desirable. The difficulty with expanding the definition of lobbying is that it invariably puts more pressure on residents and the Registrar to determine what qualifies as lobbying or not. That adds friction between residents and office holders, and staff do not believe that is in the public interest.

Expanding the definition in this way would also run counter to what staff heard from stakeholders – that it is important to keep the Registry simple and easy to understand. Removing the financial interest requirement, but exempting routine constituency/community issues, puts a burden on residents who would need to determine whether they qualify as a lobbyist every time they call a member of City Council to raise a concern. This would also drive-up costs for the City, as the Lobbyist Registrar would need to provide more frequent advice.

Explicitly linking the definition of lobbying to include a financial interest in the policy outcome being pursued ensures transparency regarding the impact of external profit motives on decision-making, thereby safeguarding the public interest through openness and accountability. This definition is also clear and easy to understand. When City staff met with for-profit and not-for-profit stakeholders, the most raised concern was that the Registry By-law and Registry would be difficult to understand and cumbersome to use. Drawing a clear line between what qualifies as lobbying and what does not, by connecting lobbying to a financial interest, helps meet that need.

## **What is a financial interest?**

The term financial interest is not defined in the Municipal Act, and no comparator municipality in Ontario includes a definition of this term in their registry by-laws. Feedback received during stakeholder engagement sessions, however, indicated that including a definition of this term was as an important measure to ensure that residents, lobbyists and office holders can easily understand what actions constitute lobbying.

Financial interest is defined in the proposed Registry By-law as follows:

A stake in a policy outcome that can reasonably be determined to have monetary impact, whether a dollar value can be easily determined or not.

For greater clarity, specific examples of what is and is not considered a financial interest are included below. These examples are not exhaustive and reflect only a few circumstances to help illustrate the definitions noted above.

The following examples would be considered to constitute a financial interest:

- A not-for-profit or for-profit organization communicating with a member of City Council to seek funding for a project where that funding would flow to the organization.
  - For example, a community service organization seeking funding for a community event or festival where the community organization is running the event or festival and the request is being made outside of any established City process for community grants or funding.
- A business owner communicating with a member of the City's Executive Team seeking a regulatory change that could reasonably be expected to increase profits or reduce losses for the business.
  - For example, a business owner seeking a reduction in the cost of a City permit or fee which impacts their business.
- A vendor communicating with City staff to encourage the purchase of a new product or service where the purchase of that product or service could reasonably be expected to increase profits for the business.
  - For example, a vendor encouraging the purchase or licensing of a piece of software outside of the normal procurement process.

The following examples would not be considered to constitute a financial interest:

- A community organization communicating with a member of City Council seeking a regulatory or programming change where the change cannot reasonably be expected to increase profits or reduce losses for the organization.
  - For example, a local advocacy organization seeking to increase service on a particular Guelph Transit route.
  - For example, a local advocacy organization seeking the addition of bike lanes on City roads.
- A business owner communicating with a member of City Council to seek the adoption of a new policy or by-law which cannot reasonably be expected to increase profits or reduce losses for their business.

- For example, a downtown business owner communicating with a member of City Council to indicate their support for a new affordable housing program.

### **Does the proposed Registry apply equally to for-profit and not-for-profit businesses?**

Yes, the Registry By-law does not reference either the not-for-profit or for-profit sectors. It is agnostic to how a group, business, organization or association is organized or run. In that sense, the Registry By-law applies equally across the not-for-profit and for-profit sectors. The nature of a for-profit business, however, does mean they are more likely to qualify as lobbyists than a not-for-profit. The profit motive present in businesses makes them more likely to meet the definition of lobbying more frequently than a not-for-profit or charity. Many not-for-profits, however, will still qualify as lobbyists when talking to office holders. The purpose of Guelph's Registry is to provide transparency on lobbying when the lobbyists stand to gain financially from the policy outcomes they are pursuing. That purpose is not impacted by whether a lobbyist is representing a not-for-profit or for-profit business.

### **Lobbyist Code of Conduct**

Section 223.9 (2) of the Municipal Act authorizes a municipality to establish a Lobbyist Code of Conduct. Although a Lobbyist Code of Conduct is not a statutory requirement, staff believe it furthers the goals of the Lobbyist Registry By-law by promoting ethical and respectful behaviour.

A Lobbyist Code of Conduct governs the conduct of lobbyists when lobbying office holders. Lobbyists are bound to act in keeping with the Lobbyist Code of Conduct and the public can file complaints to the Registrar regarding non-compliance. A Lobbyist Code of Conduct includes, but is not limited to, provisions regarding honest and ethical behaviour, accurate and complete information and respectful communication. The Lobbyist Code of Conduct is included as Attachment-2.

### **Penalties and Enforcement**

City staff are recommending that lobbyists who are found by the Registrar to have acted in contravention of the Registry By-law be subject to bans from lobbying of increasing length beginning at 30 days for the first offence, 60 days for the second offence and 90 days or more, at the Registrar's discretion, for the third offence.

At the April Committee of the Whole and City Council meetings, members of City Council asked staff to consider whether stronger penalties, including fines, would be appropriate. While monetary penalties are legislatively permitted, City staff do not believe they are necessary at this time. The purpose of the Registry is to generate additional transparency and accountability, not to act as a punitive measure which disincentivizes open and frank dialogue between office holders and lobbyists. The inclusion of financial penalties may make some individuals reticent to contact office holders for fear of a fine. This would in turn reduce the overall amount of lobbying that takes place in Guelph. That would be a bad policy outcome for the City as lobbying is a necessary and productive part of the policy making process in a healthy democracy.

In the future, if the Registrar is finding repeated contraventions and issuing several bans following the initial implementation of the Registry, City staff would recommended stronger penalties as part of a Registry By-law update.

### **Implementation and Next Steps**

The Registry By-law is proposed to come into force on October 1, 2024 with enforcement provisions suspended until December 31, 2024. On January 1<sup>st</sup>, 2025, the Registry By-law would be in full force and effect (pending approval by City Council).

When staff reported to City Council in April, the proposed implementation date was September 1, 2024. A one-month delay in implementation is being requested to provide Information Technology staff with adequate time to build the Registry tool. Building the Registry in-house allows for more customizability and saves the City tens of thousands of dollars per year in implementation and licensing costs.

Enforcement provisions are recommended to come into force three months after the rest of the Registry By-law to ensure adequate time for residents and office holders to become aware of and understand the requirements of the Registry. During the three-month period of no enforcement, City staff will undertake a communications and education campaign to ensure awareness of the Registry across the community. Were a violation to occur during this period, the lobbyist would receive a reminder explaining the requirements and the Registry By-law and the responsibilities of lobbyists.

### **Communication and Education**

The implementation of the Registry, beginning on October 1, 2024, will be accompanied by a community wide communication and education campaign. The purpose of the campaign will be to raise awareness of the Registry and its requirements as well as to offer support and training on the use of the Registry tool for lobbyists. Simultaneously, education and training sessions will be offered to office holders.

This public outreach will include, at a minimum, notices and advertisements at City facilities, notices in local newspapers, notices in distributions managed by community partners, notifications on all of the City's social media channels, educational townhalls, townhalls focused on the use of the Registry itself, splash screens at City Council meetings, open office hours where the public can ask the City Clerk's Office questions and requests to leverage the networks of community organizations.

In addition, electronic and physical materials will be produced to offer plain language guidance on Registry requirements. This will include one pagers, plain language information on the website, tools to help residents identify if they are lobbyists or not and resources to support public office holders.

### **When and how often will the Registry By-law be reviewed?**

The Registry By-law will be reviewed by City staff, with any changes going forward to City Council for approval, one year after full implementation. Subsequent reviews of the Registry By-law will take place as part of the twice-per-term Governance Reviews conducted by the City Clerk's Office.

The review of the Registry By-law after the first year of implementation (as opposed to waiting until the next Governance Review) is important because it will provide an opportunity for staff and City Council to tweak the Registry based on initial feedback from office holders and lobbyists.

### **Appointment of a Lobbyist Registrar**

City staff conducted a request for quotations for registrar services and received three responses from individuals already working with Ontario municipalities as registrars. City staff reviewed each quotation, conducted a reference check and are recommending the appointment of Suzanne Craig, Founder and Principal of Suzanne Craig Consulting as the City of Guelph Registrar. Ms. Craig has served as an integrity commissioner for more than 20 Ontario municipalities and is currently appointed as the lobbyist registrar for the City of Vaughan. In addition to her work with Ontario municipalities, Ms. Craig holds a Doctor in Jurisprudence degree from the University of Rome Faculty of Law, in Italy and has completed the Master of Law program at Osgoode Hall Law School.

### **Independence of Lobbyist Registrar**

Once appointed by City Council, the Registrar exercises the same autonomy and independence as the Integrity Commissioner. City staff, while working collaboratively with the Registrar, have no authority to direct or otherwise intervene regarding any work carried out by the Registrar, including complaint investigations should they occur.

## **General Information Regarding Guelph's Proposed Lobbyist Registry**

### **What is a municipal Lobbyist Registry?**

A municipal Registry is a public record that documents individuals engaged in lobbying and specific instances of lobbying. It provides the public with the ability to see who is lobbying office holders in Guelph and the associated instances of lobbying, including who the lobbyist was, who was lobbied, the subject matter of the lobbying and the date the lobbying occurred.

### **How does a municipal Lobbyist Registry increase transparency?**

Providing public access to information regarding the interactions between lobbyists who have a financial interest in a policy outcome and policymakers allows individuals to understand who is influencing decision-makers and what issues are being advocated for. Informed residents can then make better judgements about the policies and decisions that impact their lives, contributing to a more open and democratic culture in Guelph. While a Registry provides transparency regarding lobbying, it is worth remembering that it does not limit the amount or type of lobbying that can occur.

### **What is the role of the Registrar?**

The Registrar is an independent accountability officer appointed by City Council whose role is to provide advice and investigate complaints regarding compliance with the Registry By-law. The Registrar operates in a similar fashion to the Integrity Commissioner. The Integrity Commissioner provides advice and investigates complaints under the Code of Conduct, while the Registrar provides advice and investigates complaints under the Registry By-law.



The Registrar is an independent officer, ensuring consistent advice and enforcement of the Registry By-law without the interference of elected officials or City staff.

### **Who is considered a public office holder?**

For the purposes of a Registry in Guelph, office holders include all members of City Council, ACOCs, the Executive Team, the Leadership Team and staff acting under delegated or statutory authority.

### **Who is considered a lobbyist?**

Lobbyists are individuals who lobby office holders and who are paid or represent a financial interest with the goal of influencing any legislative action including development, introduction, approval, defeat, amendment or repeal of a by-law, motion, resolution or other decision.

### **Who is not considered a lobbyist?**

The following individuals are not considered lobbyists and may freely interact with office holders without submitting lobbyist returns:

- Individuals acting in their public capacity in the public sector (such as representatives of other municipalities, levels of government, first nations, school boards, healthcare institutions, etc.).
- City employees and office holders.
- Members of ACOCs and other local boards (Guelph Police Services Board, Guelph Public Library Board, Business Improvement Area, etc.).

Individuals included in the list above are not considered to be lobbyists, but many (for example, members of the Executive Team) are considered office holders and therefore can be lobbied by lobbyists (assuming the lobbyist is acting in accordance with the Registry By-law).

### **Examples of who are and are not considered lobbyists**

For greater clarity, specific examples of who are and are not considered lobbyists are included below. These examples are not exhaustive and reflect only a few circumstances to help illustrate the definitions noted above.

Examples of individuals considered to be lobbyists:

- Developers communicating with office holders outside of the regular approval process or course of business seeking to influence land-use planning decisions.
- Representatives of community organizations communicating with office holders to seek funding for specific projects or initiatives run by the community organization.

Examples of individuals not considered to be lobbyists:

- Representatives of a not-for-profit community organization communicating with an office holder to encourage a specific policy outcome for which they or their organization have no financial interest.
- Residents lobbying office holders on behalf of themselves for a specific policy outcome.
  - For example, a member of the public communicating with a member of City Council to seek increased sidewalk snow plowing.

- The chair of an ACOC speaking to a member of City Council to encourage them to approve an item which was previously before the ACOC.
  - For example, the chair of Heritage Guelph (an ACOC) speaking to a member of City Council to encourage them to approve a heritage designation which was recommended by Heritage Guelph.

### **What is lobbying?**

Lobbying occurs when a lobbyist attempts to influence a public policy decision or outcome. For the purposes of a proposed Registry in Guelph, lobbying would be defined as:

Any communication with an office holder by an individual who is paid or represents a financial interest with the goal of influencing any legislative action including development, introduction, approval, defeat, amendment or repeal of a by-law, motion, resolution or other decision before City Council, a committee of City Council, an ACOC or a member of staff acting under delegated or statutory authority.

### **What activities are exempted from the definition of lobbying?**

The following activities are exempted from the definition of lobbying:

- Communication that occurs during a City Council or committee meeting.
- Communication that occurs as part of a public process such as a town hall meeting, public meeting or open house.
- Communication related to a request for information.
- Communication that is solely related to a compliment or a complaint regarding a service or program.
- Communication regarding the enforcement or interpretation of an act or by-law.
- Communication regarding the implementation or administration of an existing policy, program or direction.
- Communication by an applicant or an interested party regarding general information on an application, grant, planning approval, permit or license as long as the request is part of the normal course of the approval process.
- Submission of bid proposals as part of a procurement process or any communication needed for that purpose.
- Communication by a resident on a general neighbourhood or policy issue.
- Communication related to any City-initiated community engagement process.
- Communication in direct response to a written request from an office holder.
  - This exemption is designed to ensure that office holders (such as a member of City Council or the Executive Team) can freely seek information and advice from across the community without exposing

individuals to Registry requirements when they did not initiate the interaction.

### **What are some examples of what are and are not considered lobbying?**

For greater clarity, specific examples of what is and is not considered lobbying are included below. These examples are not exhaustive and reflect only a few circumstances to help illustrate the definition noted above.

Examples of lobbying include:

- A representative of an organization speaking with the Deputy CAO of Public Services to encourage them to approve a specific community grant application.
- A developer speaking with a member of City Council regarding desired changes to the City's Official Plan or Zoning By-law.
- A developer speaking to a member of City Council, outside of a public meeting, encouraging them to approve a specific land-use planning application.
- A developer speaking to a member of Heritage Guelph (an ACOC) encouraging them to approve (or not approve) a matter before the committee.
- A representative of a business speaking with a member of City Council about changes to regulations which could impact the financial interests of their business.
  - For example, a restaurant owner speaking to members of City Council or the Executive Team to lobby in favour of changes to the seasonal patio program.

Examples not considering lobbying include:

- Communication with a member of City Council or the Executive Team where the member of City Council or the Executive Team has initiated or requested the communication.
- A representative of a not-for-profit community organization speaking to the General Manager of Parks about the availability of recreation equipment in parks where there is no financial interest on the part of the not-for-profit community organization.
- A developer speaking with Planning and Building Services staff regarding an active land-use planning application where the communication is part of the normal approval process or course of business.
- A resident speaking to a member of City Council about general community issues, such as park maintenance or waste collection.

### **Public Complaint Process**

To ensure the mandatory nature of the Registry, a public complaint process managed in coordination with the Registrar is recommended. This complaint process will operate similarly to the current [Code of Conduct for Council and Local Boards](#) complaint process, whereby complaints go directly to the Registrar for investigation without the involvement of City staff. This ensures that there is third-

party accountability applied to the requirements of the Registry and that review of such complaints is carried out in an independent and arms-length manner.

Members of the public may file complaints if they believe that the provisions of the Registry By-law have been breached. Complaints would be confidential, but not anonymous, and would include:

- Name of complainant
- Contact info for complainant
- Name of individual alleged to have violated the provisions of the Registry By-law
- Name of office holder alleged to have been lobbied in violation of the provisions of the Registry By-law
- Details regarding the nature of the suggested breach
- Any other relevant information required by the Registrar

## **Financial Implications**

If approved by City Council, Guelph's Registry will utilize a software tool developed in-house by the Information Technology department. There are no new or additional costs associated with building or maintaining a Registry. Once developed and rolled out publicly, staff expect to manage the Registry within existing workplans.

The Registrar will invoice the City for services rendered on a monthly basis. The total annual costs associated with this work are estimated to be \$10,000 to \$20,000, although final amounts will fluctuate year-to-year based on the number of requests for advice and complaints received. This budget impact will be monitored in the first two years of implementation and will be considered in the budget confirmation process in priority to other service delivery requirements.

Following implementation and monitoring in 2025 and 2026, the continuance of a Registry will be subject to budget approval.

## **Consultations and Engagement**

Following the April City Council meeting, staff in the City Clerk's Office and Community Engagement conducted targeted stakeholder engagement sessions related to the proposed Registry. The purpose of the engagement was to solicit feedback on the contents of the Registry By-law and to build awareness for the project more generally. This consultation included individuals, groups and organizations from across the not-for-profit and for-profit sectors who were deemed likely to engage in lobbying activities under the proposed Registry By-law. Individual meetings and two focus groups were held.

21 individuals and organizations, including recent Community Benefit Grant recipients and organizations which frequently advocate to City Council, were invited to participate in a not-for-profit focus group. Six not-for-profit organizations participated in the focus group.

Working collaboratively with the Chamber of Commerce, invitations to a for-profit focus group were sent to 10 organizations representing a variety of sectors including retail, development and consulting. Four organizations participated in the focus group.

In addition to the focus groups, staff reached out directly to five community associations and organizations which represent different sectors and met with the Chamber of Commerce and the Guelph Neighborhood Support Coalition as a result.

All the stakeholder engagement sessions yielded valuable insight which has impacted content throughout the Registry By-law. Specific feedback received from stakeholders is referenced through the body of this report.

## **Attachments**

Attachment-1 Lobbyist Registry By-law

Attachment-2 Lobbyist Code of Conduct

## **Departmental Approval**

None.

## **Report Author**

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## **This report was approved by:**

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