

Town of Whitby
575 Rossland Road East,
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905.430.4300
whitby.ca



March 13, 2026

Via Email

The Honourable Doug Ford
Premier of Ontario
premier@ontario.ca

Re: Enhancing Municipal Accountability: Mandatory Disclosure of Third-Party Consultants and Strategic Advisors used by Members of Council

Please be advised that at its meeting held on March 9, 2026, the Council of the Town of Whitby adopted the following as Resolution # 51-26:

Whereas transparency in municipal governance is essential to maintaining public trust and ensuring accountability of elected officials throughout their term of office;

Whereas the Town of Whitby is committed to the highest standards of transparency and ensuring that all influences on municipal decision-making are visible to the public;

Whereas Members of Council may receive strategic, communications, advisory, or political support from consultants, lobbyists, or third-party organizations outside of formal election periods;

Whereas such support may create real or perceived conflicts of interest, confer indirect benefits, or influence municipal decision-making in ways that are not visible to the public;

Whereas the current lack of a formal disclosure regime for strategic, political, and communications consultants used by Members of Council during their term of office represents a gap in the local accountability framework;

Whereas the Municipal Act permits municipalities to implement Lobbyist Registries to track third-party influence; and,

Whereas the Province of Ontario introduced Bill 9, the Municipal Accountability Act, 2025, which creates an opportunity to modernize the Municipal Act and the

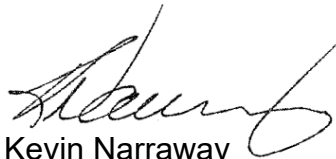
Municipal Conflict of Interest Act to standardize third-party influence disclosure requirements across Ontario.

Now Therefore be it Resolved:

1. That the Council of the Town of Whitby formally seek the assistance of the Province of Ontario and the Integrity Commissioner to implement disclosure requirements based on the following framework:
 - a. Mandatory Disclosure Requirement - Requirement that, outside of formal election periods, all Members of Council disclose the names, roles, and nature of services provided by any consultants, advisors, communications strategists, lobbyists, or third-party organizations who:
 - Provide strategic, political, communications, or advisory support to the Member during their term of office; and,
 - Are engaged, compensated, or otherwise supported directly or indirectly by the Member, a third party, or any political campaign or campaign account.
 - b. Scope of Disclosure – That the disclosures include:
 - The identity of the individual or firm;
 - The type of support provided (e.g., communications strategy, political advice, lobbying, digital outreach, issue management);
 - Whether compensation is provided directly by the Member, indirectly by another individual/campaign, or in-kind; and,
 - The duration of the support.
 - c. Public Registry Model - The establishment and maintenance of a publicly accessible registry on the Town's website listing all such disclosures.
2. That the Council of the Town of Whitby formally request the Province of Ontario to utilize the current legislative window provided by Bill 9 to establish a province-wide standard for the disclosure of third-party consultants and advisors, ensuring that all municipal accountability frameworks include mandatory reporting of strategic, communications, and political support provided to elected officials outside of formal election periods; and,

3. That, subject to the adoption of Bill 9 or any successor legislation and in any event no later than the expiry of this Term of Council, that the Integrity Commissioner and Staff report back with a framework to fulfill the disclosure requirements as outlined in Item 1, including the opportunity to more broadly define lobbyists beyond those providing support to Members of Council and to include those who seek to lobby Members through the establishment of a Lobbyist Registry; and,
4. That the Clerk be directed to circulate this resolution to the Premier of Ontario, the Minister of Municipal Affairs and Housing, MPP Lorne Coe, the Association of Municipalities of Ontario, and all Durham Region municipalities.

Should you require further information, please do not hesitate to contact the Office of the Town Clerk at 905.430.4300.



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The Honourable Rob Flack, Minister of Municipal Affairs and Housing -
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