



The Regional Municipality of Durham
To: Finance and Administration Committee
From: P. Madill, Regional Clerk
G.H. Cubitt, Chief Administrative Officer
Report No.: 2012-A-15
Date: May 8, 2012

SUBJECT:

ANALYSIS RELATED TO THE ELECTION OF THE REGIONAL CHAIR

RECOMMENDATIONS:

THAT the Finance and Administration Committee recommend to Regional Council:

- a) THAT this report be received for information; and
 - b) THAT a copy of this report be forwarded to the area municipalities for information.
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REPORT:

1.0 PURPOSE

- 1.1 In response to the motion passed at the April 4, 2012 Regional Council meeting, the Chief Administrative Officer and Regional Clerk have prepared this report updating the information from the previous term of Council regarding the implications of the Direct Election of the Regional Chair.

2.0 ELECTION OF THE CHAIR HISTORY

- 2.1 The subject of a directly elected Regional Chair was first discussed by Council on February 25, 1998 and has been considered by Council on a number of occasions. An overview of the history is included as Attachment #1 to this report.

3.0 ELECTION OF THE REGIONAL CHAIR

- 3.1 Section 11.1 of the *Municipal Elections Act, 1996*, provides that the Regional Clerk is the person responsible for conducting the election for the office of Regional Chair, subject to subsection 11.1(5). **Subsection 11.1(5) of the *Municipal Elections Act, 1996*, provides that the clerk of each lower-tier municipality is the person responsible for conducting the election in the lower-tier municipality and reporting the vote recorded to the Regional Clerk who shall prepare the final summary and announce the result of the vote.**

3.2 The *Municipal Elections Act, 1996* would govern the process for nominations to the Office of Regional Chair if the position was directly elected. Every person is qualified to be elected or to hold office as Regional Chair, who is:

- i) a resident of the Region or the owner or tenant of land in the Region, or the spouse of such owner or tenant;
- ii) a Canadian Citizen;
- iii) at least 18 years of age;
- iv) not prohibited from voting in the municipal election; and
- v) not disqualified by the *Municipal Act* or any other Act from holding the office.

4.0 **DUTIES OF THE REGIONAL CHAIR**

4.1 In addition to the duties set out in the *Municipal Act*, Section 13.2 of the Council Rules of Procedure provides:

"Under the Rules of Procedure, it also shall be the duty of the Chair:

- (a) to open the meeting of Council by taking the chair and calling the Members to order;*
- (b) to receive and submit, in the proper manner, all motions presented by the Members;*
- (c) to put to vote all questions, which are duly moved and seconded, and to announce the result;*
- (d) to decline to put to vote, motions which infringe upon the Rules of Procedure or which are beyond the jurisdiction of Council;*
- (e) to restrain the Members, when engaged in debate, within the Rules of Procedure;*
- (f) to enforce on all occasions, the observance of order and decorum by the Members and any other persons present in the Chamber;*
- (g) to call by name, any Member persisting in breach of the Rules of Procedure and to order him/her to vacate the Chamber in which the meeting is being held;*
- (h) to authenticate by his/her signature, when necessary, all by-laws, resolutions and minutes of Council;*
- (i) to inform the Council on any point of order as seems necessary;*
- (j) to represent and support the Council, declaring its will and implicitly obeying its decision in all things;*
- (k) to perform other duties when directed to do so by a resolution of Council;*
- (l) if he/she considers it necessary because of grave disorder, to adjourn the sitting without the question being put, or suspend the sitting for a time to be specified by him/her;*
- (m) to ensure that no person except a Member, officer or employee of the Regional Corporation is permitted to enter upon the floor of the Chamber during the sittings of the Council without permission of the Chair or the Council."*

4.2 Section 13.1 of the Council Rules of Procedure provides that it shall be the role of the Chair to carry out the responsibilities set forth in the *Municipal Act, 2001*, Section 225. Section 225 of the *Municipal Act, 2001*, provides that the role of the head of council is:

- (a) to act as chief executive officer of the municipality;
- (b) to preside over council meetings so that its business can be carried out efficiently and effectively;
- (c) to provide leadership to the council;
- (c.1) without limiting clause (c), to provide information and recommendations to the council with respect to the role of council described in clauses 224 (d) and (d.1);
- (d) to represent the municipality at official functions; and
- (e) to carry out the duties of the head of council under this or any other Act.

Clauses 224 (d) and (d.1) of the *Municipal Act, 2001*, provide that it is the role of council to:

- (d) ensure that administrative policies, practices and procedures and controllership policies, practices and procedures are in place to implement the decisions of council; and
- (d.1) ensure the accountability and transparency of the operations of the municipality, including the activities of the senior management of the municipality.

Section 226.1 of the *Municipal Act, 2001*, provides that as chief executive officer of a municipality, the head of council shall:

- (a) uphold and promote the purposes of the municipality;
- (b) promote public involvement in the municipality's activities;
- (c) act as the representative of the municipality both within and outside the municipality, and promote the municipality locally, nationally and internationally; and
- (d) participate in and foster activities that enhance the economic, social and environmental well-being of the municipality and its residents.

5.0 CAMPAIGN EXPENSES AND CONTRIBUTIONS

5.1 Section 5 of Ontario Regulation 101/97 prescribes the formulas for determining the maximum amount of expenditures under subsection 76(4) of the *Municipal Elections Act*. The prescribed formula for candidates for the office of head of council in the 2010 municipal election was \$7,500 plus 85 cents for each eligible elector. Using the prescribed formula, the 2010 campaign spending limit would have been \$365,087.35 if the position of Regional Chair was directly elected.

5.2 Subsection 70(3) of the *Municipal Elections Act, 1996*, provides that only the following may make contributions to a candidate:

1. An individual who is normally resident in Ontario;
2. A corporation that carries on business in Ontario;
3. A trade union that holds bargaining rights for employees in Ontario; and
4. The candidate and his or her spouse, subject to subsection 70(5) of the *Municipal Elections Act*.

5.3 Subsection 70(4) of the *Municipal Elections Act* does not permit a federal or provincial political party, constituency association or a registered candidate to make a contribution to a candidate running for municipal office.

6.0 POLICY CONSIDERATIONS

6.1 Subject to enactment of the Regional Chair Election By-law (By-law No. 19-2012), the Clerk's Department will begin the process of reviewing the Council Rules of Procedure in order to identify revisions necessary to reflect the direct election of the Regional Chair. Some of the changes that will be required to reflect a directly elected Regional Chair include:

- Appointment of Chair [Section 9.1] – amendment to delete the appointment of the Chair at Inaugural Council meeting
- Voting on Motions – Chair or Acting Chair [Section 20.2] – amendment to reflect that the Chair or Acting Chair has a vote on all matters
- Voting on Motions – Members Present [Section 20.3] – amendment to delete the words 'except for the Member occupying the Chair'
- Voting on Motions – Recorded Vote [Section 20.5] – amendment to delete the words 'except the Chair' from part c) and to delete part d)
- Voting on Motions [new Section] – wording to reflect that where a vote is taken and a tie results, the question shall be deemed to have been decided in the negative

6.2 As noted in section 6.1 above, there will be changes that are **required** to the Council Rules of Procedure as a result of the change to a directly elected Chair. However, there are other **potential** changes that Council may wish to consider as a result of changing to a directly elected Regional Chair. One example is that an elected Regional Chair could play a much more active role in the selection of Standing Committee members (See reference in Section 9.2 and 9.3 for the Regional Municipalities of Waterloo and Halton).

6.3 A directly elected Regional Chair may change the dynamic between the Chair and Council. A Chair that is elected Region-wide has only one vote at Council but may be perceived to have much more influence than a councillor, especially if elected with a sizeable majority.

- 6.4 The dynamic between upper and lower tier councils also may change. The lower tiers may perceive their influence to be reduced due to a stronger public focus on “region-wide” issues. These issues would likely be highlighted as part of the Regional Chair’s election platform.
- 6.5 An elected Regional Chair may campaign on a particular position on an issue or may publicize their views on an issue prior to Council making a decision. He/she may publicly lobby for support of that position in the media or through speaking engagements.

7.0 STAFFING CONSIDERATIONS

- 7.1 There are currently two staff positions supporting the Regional Chair’s office, which were hired through the usual Regional staffing and succession processes. Where new hires were required, the Regional Chair participated in the final interview process; however the selection decisions were based on the typical approach for non-union staff. In many larger Ontario municipalities, there is at least one staff person who is hired on a contract basis to serve at the pleasure of the Mayor or Chair.
- 7.2 An elected Regional Chair may wish to undertake significantly more public events and public speaking than under the present system. This may require dedicated resources to manage events, prepare speaking notes, provide transportation and media relations.
- 7.3 The CAO’s Office and Clerk’s Department would also need to play a role in determining what activities are rightfully “corporate” and which activities can be conducted by Regional staff under current legislation during the election campaign period.

8.0 FINANCIAL CONSIDERATIONS

- 8.1 The cost to the Clerk’s Department as a result of submitting a question to the electors was approximately \$17,200. Costs were incurred related to the following items: giving of notice; communications plan; election night resources and staffing; and establishment of a Compliance Audit Committee.
- 8.2 In order to conduct the election for the Office of Regional Chair, additional costs will be incurred by the Regional Clerk’s Department. It is estimated that \$40,000 to \$50,000 will be required to cover election related expenses, including: statutory notices; advertising; election night resources; and a Compliance Audit Committee. There may also be additional staffing requirements and capital costs for secondary network and internet sources. In accordance with subsection 7(3) of the *Municipal Elections Act, 1996*, the Region would also be responsible for reimbursing reasonable costs incurred by a local municipality in the event of a recount or by-election.

- 8.3 As noted in the section on staffing considerations, there could be increased staffing requirements as a result of the change to an elected Regional Chair. Any increases to the Clerk's Department and Regional Chair's Office budgets would be subject to the Region's annual Business Planning and Budget Process.

9.0 **PROCESSES IN OTHER REGIONAL MUNICIPALITIES**

- 9.1 Of the six remaining Regional municipalities, the current selection of Regional Chair is as follows:

	<u>Directly Elected at Large</u>	<u>Elected by Regional Council</u>
Halton	X	
Muskoka (District)		X
Niagara		X
Peel		X
York		X
Waterloo	X	

- 9.2 **Regional Municipality of Waterloo** - The Region of Waterloo has had a directly elected Regional Chair since 1997 and since 2000 has had directly elected Regional Councillors, with the mayors of the local municipalities continuing as members of Regional Council by virtue of their office as mayor. Waterloo Regional Council is currently comprised of 16 members, including the Regional Chair. The Region of Waterloo is made up of 7 lower-tier municipalities with a total population of approximately 534,900.

The Regional Chair in Waterloo has a role in the selection of members of Standing Committees. He/she makes recommendations to Council for the appointment of Members to the Standing Committees.

During the 2010 municipal election, there were two candidates for the Office of Regional Chair. There were a total of 340,223 eligible electors for the 2010 municipal election and the overall voter turnout was 28.97%. The overall voter turnout for the 2006, 2003 and 2000 municipal elections was 26.58%, 24.57% and 26.90% respectively.

The change to a directly elected Regional Chair has not impacted the operating costs of the Regional Chair's Office. The Regional Chair maintains one office which is located in the Regional Administration Building in Kitchener.

There has been an increase in the Clerk's Department operating budget as a result of conducting the election. The Region of Waterloo currently sets aside \$10,000-\$15,000 annually in an account to cover election related expenses, including website design, statutory notices, advertising, and the inaugural meeting of Council.

- 9.3 **Regional Municipality of Halton** - Halton Region has had a directly elected Regional Chair since the 2000 municipal election. Halton Regional Council is currently comprised of 21 members, including the Regional Chair. The Region of Halton is made up of 4 lower-tier municipalities with a total population of approximately 501,600.

During the 2010 municipal election only one eligible nomination was received for the Office of Regional Chair. Mr. Gary Carr was declared elected by acclamation.

The operating costs of the Regional Chair's Office have varied depending on the individual elected as Regional Chair. The Regional Chair maintains one office which is located in the Halton Regional Centre in Oakville.

There has been an increase in the Clerk's Department operating budget as a result of conducting the election. The Region of Halton currently budgets \$15,000 every four years for election related expenses, including advertising and the inaugural meeting of Council.

The Regional Chair in Halton has a role in the selection of members and the operation of Standing Committees. He/she chairs the Striking Committee which makes recommendations to Council for the appointment of Members to the Standing Committees and their alternates. In addition the Regional Chair is the chair when two or more Standing Committees meet jointly.

- 9.4 **Regional Municipality of Niagara** - Niagara Region has a Regional Chair who is appointed by the members elected to Regional Council; however they have 18 directly elected Regional Councillors in addition to the 12 mayors of the lower-tier councils who serve as members of Regional Council by virtue of their office as mayor. Niagara Regional Council is currently comprised of 31 members, including the Regional Chair. Niagara Region is made up of 12 lower-tier municipalities with a total population of approximately 431,300.

The clerk of each lower-tier municipality conducts the election for the Office of Regional Councillor, in addition to conducting the election of members to the council of the lower-tier municipality. Niagara Region only reimburses costs incurred in the event of a by-election for the Office of Regional Councillor.

10.0 **CONCLUSION**

- 10.1 It is recommended that this report be received for information and a copy be forwarded to the area municipalities for their information.
- 10.2 Information related to the election of the Regional Chair and the question submitted to the electors on October 25, 2010 is available on the Regional website at www.durham.ca/elections.

Respectfully submitted,

P.M. Madill, A.M.C.T., CMM III
Regional Clerk

Garry H. Cubitt, M.S.W.
Chief Administrative Officer

Attachments: #1 Election of the Chair History
 #2 Municipal Comparisons
 #3 Summary Chart

Appendices to Attachment #1 (on CD):

 #1 Report #98-J-19
 #2 Report #98-J-26
 #3 Report #2002-COW-1
 #4 Report #2002-COW-2
 #5 Correspondence from Regional Councillor J. Schell
 #6 Report #2010-A-25
 #7 Report #2012-A-11

ELECTION OF THE CHAIR HISTORY

- 1.1 Since the Region was formed on January 1, 1974, the Regional Chair has been appointed by the members elected to Regional Council. Although the composition of Council has changed twice, from 30 plus the Regional Chair in 1974, to 32 plus the Regional Chair in 1988, to 28 plus the Regional Chair in 1998, the process for selection of the Regional Chair has not varied far from the original method of selection, although options for direct election of the Chair have been considered since 1998.
- 1.2 The subject of a directly elected Regional Chair was first discussed by Council on February 25, 1998.
- 1.3 Report #98-J-19 (on enclosed CD) was presented to the Finance and Administration Committee on November 12, 1998. The report included information on the electoral process and a review of other regional government structures at the time. The report also offered 4 options for the Election of the Regional Chair.

The Finance and Administration Committee at its meeting of November 12, 1998, referred the report back to staff and requested staff to provide information on an additional option whereby the Regional Chair would be elected from the members of Regional Council at the next term of office, provided it would not take affect unless the current Regional Chair was defeated or declined appointment.

- 1.4 Report #98-J-26 (on enclosed CD) was presented to the Finance and Administration Committee on November 25, 1998. The report put forth a fifth option for the selection of the Regional Chair. The Finance and Administration Committee at its meeting of November 25, 1998, recommended to Regional Council that Option 1 (Maintain the Status Quo – Regional Chair elected by Regional Council) be adopted. On December 2, 1998, Regional Council approved Option 5 (that the Current Chair be re-elected and/or elected from among Council).
- 1.5 In February 2002, notice was given to introduce a motion at the next or subsequent meeting of Council to request the Province to amend the *Regional Municipality of Durham Act* to provide for the Direct Election of the Regional Chair effective 2003. On March 6, 2002, Council referred the motion to an Ad Hoc Committee comprised of 8 members of Council representing each local municipality. The mandate of this committee was to prepare a report reviewing the options for the selection of the Regional Chair and the Chair's role.
- 1.6 Report #2002-COW-1 (on enclosed CD) was presented to Council in Committee of the Whole on May 8, 2002. The Ad Hoc Committee suggested three options for the selection of the Regional Chair and four procedural options for the selection of the Regional Chair. At its meeting on May 8, 2002, Council passed a motion to

receive Report #2002-COW-1 for information and to forward the report to the area municipalities for review, with a response and comments to be submitted to the Region by June 18, 2002.

- 1.7 Report #2002-COW-2 (on enclosed CD) was presented to Council in Committee of the Whole on July 10, 2002. The Ad Hoc Committee's recommendation for the election of the Regional Chair, which was subsequently adopted by Council, was:
- a) THAT the previous resolution of Regional Council dated December 2, 1998 with respect to the election of the Regional Chair be rescinded; and
 - b) THAT the Regional Chair be appointed by the elected members of Regional Council with the position open to all electors of the Region of Durham (should the Chair selected be a member of a lower tier municipality he/she would resign).

The process adopted by Council on July 10, 2002, is the current process for the appointment of the Regional Chair.

- 1.8 On March 24, 2004 a Notice of Motion was presented to Council to initiate the process for the direct election of the Regional Chair under the provisions of the *Municipal Act*. The motion was tabled to May 5, 2004 in order to allow the area municipalities to comment. On May 5, 2004 Council further tabled the motion upon the request of a municipality for additional time in order to get public input on the matter. On May 26, 2004 the Motion was lifted from the table and was received for information. At that same meeting a notice of motion was presented to rescind the resolution to receive the motion for information. On June 16, 2004 the motion to rescind was defeated.
- 1.9 On July 7, 2004 a Notice of Motion was presented to Council to establish a Task Force, consisting of one Regional Councillor per municipality to review the current process of election of the Regional Chair and the role of the Regional Chair. The motion was tabled until Council's next strategic planning session. At Council's Strategic Planning Session (Regional retreat) held in November 2005 information on the election process for the Regional Chair was circulated.
- 1.10 On October 25, 2006 correspondence (on enclosed CD) was received from Regional Councillor Jim Schell advising that following the Regional retreat in November 2005, selected Councillors met as an informal group to consider the role of the Regional Chair. Recommendations were brought forward by the group and at its meeting on October 25, 2006 Council passed a motion that the correspondence be received for information.
- 1.11 On February 15, 2006 a Notice of Motion was presented to Council to include a question on all November 2006 municipal election ballots in the Region of Durham. The motion was defeated by Council on February 15, 2006.

- 1.12 On February 14, 2007 a Notice of Motion was presented to Council to endorse Bill 172, the *Municipal Amendment Act (Direct Election of Durham Regional Council Chair), 2006*. The motion was passed by Council on February 14, 2007. Bill 172, the *Municipal Amendment Act (Direct Election of Durham Regional Council Chair), 2006*, subsequently died on the order papers when the Ontario Legislature prorogued on June 5, 2007.
- 1.13 On February 17, 2010 a Notice of Motion was presented to Council to consider submitting a question to the electors in the Region of Durham on the October 25, 2010 municipal election ballots. The motion was carried by Council on March 10, 2010 and a public meeting was subsequently held on April 21, 2010. On April 21, 2010 Council passed By-law No. 20-2010 to submit a question to the electors on the October 25, 2010 municipal election ballots.
- 1.14 Report #2010-A-25 (on enclosed CD) was presented to the Finance and Administration Committee on June 16, 2010. The report addressed matters related to the Question on the Ballot and provided a brief history of the election of the Regional Chair, an overview of the process in other Regional municipalities, information from the 2006 municipal elections, and reviewed sections of the *Municipal Act* and *Municipal Elections Act* related to the role of the head of Council, the term of office, campaign expenses and campaign contributions. On June 23, 2010, Council passed a motion to receive Report #2010-A-25 for information; to authorize the Clerk's Department to incur additional costs as a result of submitting a question to the electors on the October 25, 2010 municipal election ballot; and to forward the report to the area municipalities for information.
- 1.15 On October 25, 2010 the following question was submitted to the electors in all lower-tier municipalities in The Regional Municipality of Durham on the regular election ballot:

"Are you in favour of the Council of the Regional Municipality of Durham passing the necessary resolutions and by-laws to change the method of selecting its Chair from appointment by the members of Regional Council to election by general vote of all electors in the Region?"

YES

NO

- 1.16 In 2010, the total number of eligible electors Region-wide was 432,256. **The total number of votes cast was 119,666, representing a voter turnout of 27.68%.** Since less than 50 per cent of all eligible electors voted on the question, the results of the vote were not binding and there was no legislative requirement for Council to implement the results. The following table outlines the response of the electors in each area municipality:

	YES		NO	
Ajax	13,788	85.31%	2,375	14.69%
Brock	3,017	72.87%	1,123	27.13%
Clarington	13,532	82.48%	2,874	17.52%
Oshawa	21,117	78.36%	5,833	21.64%
Pickering	14,905	83.38%	2,972	16.62%
Scugog	5,082	66.45%	2,566	33.55%
Uxbridge	4,765	68.83%	2,158	31.17%
Whitby	19,171	81.37%	4,388	18.63%
TOTAL	95,377	79.70%	24,289	20.30%

- 1.17 On December 22, 2010 Regional Council passed a resolution to request the Minister of Municipal Affairs and Housing to enact a regulation authorizing The Regional Municipality of Durham to exercise its powers under Section 218 of the *Municipal Act, 2001* in order to change the method of selecting the Regional Chair (head of council) to election by general vote, in accordance with the *Municipal Elections Act, 1996*, to be effective for 2014.
- 1.18 The Minister of Municipal Affairs and Housing enacted Ontario Regulation 3/12 on January 10, 2012, pursuant to the *Municipal Act, 2001* authorizing the Council of The Regional Municipality of Durham to exercise its power under Section 218 of the *Municipal Act, 2001* to change the method of selecting the head of Council.
- 1.19 Report #2012-A-11 (on enclosed CD) was presented to Regional Council on April 4, 2012 with a recommendation that the Regional Chair Election By-law be presented for consideration. Council passed By-law No. 19-2012 on April 4, 2012 to change the method of selecting the Regional Chair to election by general vote, in accordance with the *Municipal Elections Act, 1996*. In order for By-law No. 19-2012 to come into force, the by-law must pass a "triple majority". If By-law No. 19-2012 receives "triple majority" approval before December 31, 2013, the Regional Chair will be elected by general vote at the next regularly scheduled municipal elections being held in October 2014. A "triple majority" is achieved when:
- the by-law receives the support of a majority of all votes of Regional Council;
 - a majority of the councils of all lower-tier municipalities pass resolutions consenting to the by-law; and
 - the total number of electors in the lower-tier municipalities that have passed resolutions consenting to the by-law form a majority of all the electors in the Region.

ATTACHMENT #2

REGIONAL MUNICIPALITIES COMPARISON

	Size of Council	# of Lower-tier Municipalities	Population		# of Staff in Regional Chair's Office	Regional Chair's Salary (2011)
			2011*	2031 ⁺		
Durham	28 + Chair	8	608,124	960,000	2	\$195,824.77
Halton	20 + Chair	4	501,669	780,000	3	\$159,994.61
Niagara	30 + Chair	12	431,346	511,000	not available	at time of printing
Peel	24 + Chair	3	1,296,814	1,640,000	2.5	\$177,903.32
Waterloo	15 + Chair	7	507,096	729,000	2	\$153,527.00
York	20 + Chair	9	1,032,524	1,500,000	2	\$207,654.76

*2011 Census population, excluding net undercoverage

⁺2031 Forecast from the Growth Plan for the Greater Golden Horseshoe

AREA MUNICIPAL COMPARISON

	Size of Council	# of Staff in Mayor's Office	Mayor's Salary (2011)		
			Local	Regional*	Total
Ajax	6 + Mayor	2	\$78,052	\$49,537	\$127,589
Brock	6 + Mayor	0	\$28,205	\$49,537	\$77,742
Clarington	6 + Mayor	2	\$80,820	\$49,537	\$130,357
Oshawa	10 + Mayor	2	\$85,620	\$49,537	\$135,157
Pickering	6 + Mayor	3	\$77,700	\$49,537	\$127,237
Scugog	6 + Mayor	.5	\$37,410	\$49,537	\$86,947
Uxbridge	6 + Mayor	.5	\$41,910	\$49,537	\$91,447
Whitby	7 + Mayor	3	\$80,548	\$49,537	\$130,085

*Excludes payment for Standing Committee Chair's and appointments to agencies and boards

SUMMARY CHART

	Chair appointed by Council	Directly Elected Chair
Accountability	To council	To electors and council
Transparency on issues	Adopts the position of council	Runs on a Region-wide platform
Voting pattern	Rarely votes in Council – only to break a tie	Votes on all decisions
Cost to candidates	None	Campaign expenses
Cost to municipalities	None	Election costs (e.g., advertising, audit, additional staff)
Staff support	Civil service	Civil service
Salary and expenses	Decision of Council	Decision of Council
Effect on voter turnout	None	Acclaimed in Halton Evidence in Waterloo suggests no increase in voter turnout due to election of Chair
Interface with public and stakeholders	Annual visits to Councils, Boards of Trade and Chambers of Commerce; attending events	Likely to be similar but may be increased appearances
Comments to the public	Fact oriented, reflecting the adopted position of Council, or following Council direction	May reflect own position, and be more platform based