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# TOPIC

**The Public Interest  
And the  
Right To Know**



Bureau of Municipal Research  
Better Government through Research

#### ACKNOWLEDGEMENTS

The Bureau of Municipal Research and the Institute of Public Administration of Canada extend their thanks to both the panelists and the participants for their respective contributions to the seminar.

We also wish to thank the City of Windsor for its generous financial support.

It should be noted that the views expressed at the seminar and reported here are not necessarily those of the institutions with which the individual speakers are affiliated. The seminar proceedings (Sections II, III and IV) were edited jointly, in the first instance, by IPAC and BMR. The concluding essay (Section V) was drafted by the Bureau and is the responsibility solely of the Bureau of Municipal Research.

#### THIS TOPIC IN BRIEF

How should local governments and their respective local news media relate to one another?

How accessible should information in the possession of local governments be to their citizens?

These timely questions capture the two themes explored at a recent seminar entitled "The Public Interest and the Right to Know". The seminar was co-sponsored by the southwestern offices of the Bureau of Municipal Research and of the Institute of Public Administration of Canada, and took place in Windsor on October 8, 1978. This Topic is a summary of the seminar proceedings.

Given the nature of the questions, no definitive answers were expected to emerge from the seminar. And, true to our expectations, none did. On the other hand, seminar participants did make a number of proposals. The Bureau has highlighted them in the concluding section, and derived recommendations from a few.

The primary value of the seminar lay in focusing public attention, and the thinking of close observers and practitioners, on every day problems in the absence of daily pressures that inhibit solutions.

SECTION I: INTRODUCTION

On October 8, 1978, the Southwestern Regional Office of the Bureau of Municipal Research (BMR) and the Southwestern Ontario Regional Group of the Institute of Public Administration of Canada (IPAC) co-sponsored a seminar in Windsor, Ontario, entitled, "The Public Interest and The Right to Know". Its two major themes were the relationship between local government and the media, and public access to information held by, and to the proceedings of, local government. (See the Seminar Programme, Appendix A.)

For the BMR, the seminar represented something of an extension, both geographically and substantively, of a conference staged by the Bureau in Toronto in May, 1976, entitled, "The News Media and Local Government".<sup>1</sup> The expressed purpose of that conference was to examine the relationship between the news media and local government in Metropolitan Toronto - in particular, the extent to which the media serve the public and influence municipal decision-makers. The Windsor seminar was something of a re-run for IPAC as well, inasmuch as its Edmonton Regional Group recently sponsored a conference on the working relationship between public servants and the media.

The freedom of information dimension of the Windsor seminar represented a new departure for both sponsoring organizations. Its inclusion seemed almost mandatory in view of the recent mounting pressures on several political fronts to improve or to restrict access to certain types of government-held information and proceedings. The anticipated legislative responses to these pressures are bound to have a profound impact upon the relationships between citizens, government officials, and journalists.

The Windsor seminar's two main themes give rise to many questions of considerable practical import. From them we selected the following for inclusion in the printed announcements of the seminar:

Can the media inform the electorate and constructively criticize public policy, without making the public official's life an intolerable "fishbowl"? How does the public official avoid the risks of adverse or uninformed criticism without seeking the refuge of "confidentiality"? What are the costs and benefits of proposed freedom of information legislation? Will government administrators be inhibited in their efforts to develop policy and to improve programs? Should rights of access to meetings of public officials, such as municipal council committees, be expanded?

It is readily apparent that questions such as these do not invite easy, clear-cut answers. Rather, their answers vary with time, place, and context. In recognition of this, the seminar was intended primarily to bring such ongoing concerns to the fore in Southwestern Ontario by providing a forum for their discussion. Accordingly, the invited speakers were given a free hand to address those questions that most interest them.

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<sup>1</sup>See BMR's Civic Affairs of the same title, dated August, 1976.

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 In this Topic the remarks of each speaker have been summarized in the order in which they were presented at the seminar. Those of the keynote speaker are printed in full. The Topic concludes with a brief interpretive summary and critique which contains a number of recommendations advanced by the Bureau of Municipal Research.

SECTION II: GOVERNMENT AND THE MEDIA: ASSOCIATES OR ADVERSARIES?

Chairman: George Vance, Co-ordinator, Southwestern Regional Office, Bureau of Municipal Research

Panelists: Andrew Brandt, Mayor of the City of Sarnia  
 Robert McAleer, Managing Editor, The Windsor Star  
 Les Mather, Reporter, CBE Radio, Windson

Mayor Andrew Brandt

Andy Brandt began by noting a parallel between politicians and reporters: both must know whereof they speak and write, or risk being publicly exposed as incompetent. Emphasizing that incompetent reporters were the exception in his experience, he noted that there is simply no excuse for ignorance, such as that displayed by "more than one" reporter in his experience, who did not know the difference between a current and a capital budget. He reviewed reporting techniques in each of radio, television, and newspaper, observing that the last is best suited to reporting and analyzing complex municipal issues. He objected to reporters who intentionally "twist the news to emphasize the negative" and who intentionally "heat up sensitive issues". Two of his examples were: (1) the 5c transit fare increase becoming 17% in a news report that ignores some relevant factors; and (2) decisions regarding neighbourhood traffic movement in which Council's options are few, that are undermined in press reports by emphasis the emotional charge that a child may be killed as a result of Council's decisions. In the case of a traffic decision affecting a given neighbourhood, Mayor Brandt regards the residents who live on the affected street as the only people with a "real" or genuine interest in the decision. The travelling public, in contrast, has a "remote" interest at best and is therefore not as interested in detailed information (such as traffic volumes, accident frequency) on which Council's decision is based.

Noting that "the vast majority of news items can and should be released to the public", Mayor Brandt then presented a list of Council items about which the public does not have a right to know. It is the policy of Sarnia City Council to discuss the following matters behind closed doors:

- (a) Matters where premature public disclosure could cost the public money or be prejudicial to the interest of a property owner or the City when the acquisition or the sale of property is being investigated or negotiated; however, once firm negotiations are complete, the acquisition or sale of said property should be discussed in public;
- (b) Personnel matters where employee relations or reputations could be damaged and negotiations on salaries or working conditions of employees;
- (c) Matters where public discussion could prejudice the City's legal position or be detrimental to the City in proceedings before any Court or Administrative Tribunal;
- (d) Appointments to Boards, Committees, and Commissions;

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(e) Consideration of Awards of Merit;

(f) With the consent of the majority of the Members present, items felt by the Mayor to be of a sensitive nature.

The policy of discussing property purchases and wage negotiations in camera was defended by illustrations of the anticipated "costs" to the City and, therefore, to the public (e.g. inflated asking prices) of discussing them in open session.

Notwithstanding Sarnia's policy, Mayor Brandt would like better ground rules set down in legislation. He cited approvingly two recommendations made by the Association of Municipalities of Ontario to the Williams Commission on Freedom of Information. These are:

(1) The Association endorses, as a general principle, the right of the individual in society to full, objective and timely government information, and the corresponding duty of municipal government to make available information about its affairs.

(2) The Association strongly supports a comprehensive review and updating of all legislation governing public access to municipal information with a view to its consolidation and clarification in accordance with the following recommendations:-

(a) The Association would support the introduction of legislation which, having regard to the distinctive nature of municipal government, would establish clear rules concerning the conduct of public business in municipalities by stipulating that all meetings of Councils, committees of Council, and local boards shall be open to the public subject to certain specific exceptions (for example, when personnel, labour relations, property acquisitions and advice of counsel or pending or possible litigation matters are being dealt with).

(b) The legislation should place all municipal records in the public domain and specify any exceptions that are to be made to this general rule.

(c) Municipalities should not be compelled to provide copies of documents that are filed with the municipality and subject to copyright or similar restrictions (e.g. architects' plans). Councils should be allowed to set reasonable fees and establish other reasonable procedures for the production and inspection of all documents.

(d) Disputes concerning freedom of information should be resolved by the courts or by a tribunal set up for such purpose. The courts or tribunal should be empowered to impose conditions on the release and use of information.

Mayor Brandt ended his remarks with a call for better preparation of reporters before they "are sent out on the street", for fewer "pious pronouncements about "no-win problems" of the stray dog variety, and for constructive analytical comment and criticism of Council decisions.

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Robert McAleer

Robert McAleer began by rejecting the choice "Associates or Adversaries?" as no choice at all. For each suggests that the reporter, or his organization, has a preconceived notion of what his report will look like. The public would be quite shocked to discover any special relationship between government and the media - or between media and business, media and labour, and so on. He observed that the recent past has been characterized first by "adversary journalism", and then by the "advocacy journalism" which reached its peak in the late 1960's. In those days the press was predisposed to see "a hand in every till, a crook in every board room, and a monster behind too many smiling political faces". Since then, however, journalism has matured to the point where its approach, if not its end product, can be characterized as independent and objective.

The main ingredient of this independent approach is "skepticism", as distinct from "cynicism" and from "suspicion". The skeptical journalist wants "to be shown" before he passes judgement. Sound demonstrations by government officials will earn them the praise from the press to which they are often entitled. But officials should remember that each plaudit must be earned anew.

Mr. McAleer concluded his presentation with a few brief remarks on the proposed Federal legislation on Freedom of information. He doubted it would be very effective for the reason that the exemptions implied by the Official Secrets Act, which is incorporated into the legislation, are far too broad. The freedom of information legislation enacted recently by the United States Government is much to be preferred.

Les Mather

Les Mather's brief remarks centred upon the pressures and problems of the reporter's job. The major pressure is that of deadlines which often preclude the additional research that can make the difference between mediocre and top quality reporting. One of the major problems is the low salaries paid to reporters which make the job less attractive to the better educated and the more professional. "Many reporters" covering local government are, in consequence, "poorly trained" and "inexperienced". This is quite ironical given that information gleaned from politicians and administrators on a one-to-one basis by reporters is still the foundation on which the coverage of local affairs is built. Another problem is the secretive attitude and proceedings of some councils in matters where they are not justified. Mr. Mather cited an instance in which a suburban Council in the Windsor area hastily passed, with no public debate, a by-law that raised taxes by 30 percent.

Mr. Mather identified the two main tools of the press as objective reports and editorial opinion which, he noted, are often confused. The confusion on the part of reporters often stems from being human: "Some politicians you like, some you don't."

DISCUSSION PERIOD

Closed Meetings

Mr. McAleer's passing reference to the Kitchener newspaper's role in colluding with council to keep the Kitchener farmer's market redevelopment secret, led Michael LaPointe of CFCO TV in Chatham to suggest that the media should refuse

the media should refuse to accept invitations to meetings of council that are closed to the public. Mr. McAleer responded that the problem lay in the agreement of the senior executive of the Kitchener-Waterloo Record not to break the story. In his view, the reporters who attended the closed meeting could (and should) have broken the story without violating the Council's confidence. They might have done this by expanding a peripheral lead to the proposal, gained elsewhere than at the closed meeting, through interviews with those in attendance at the meeting. Mr. Mather agreed that ways exist to make public confidential matters discussed in closed meetings at which reporters are present, without breaching a trust.

#### Citizen Access To And Interest In Information

Trevor Price of the University of Windsor expressed the concern that smaller municipalities in the Windsor area often deny, for unpersuasive reasons, information that citizens require to defend their interests, against development proposals. Mayor Brandt responded that The Planning Act sets out clear requirements for informing those affected by a development proposal, such as a rezoning. In other matters, such as road widening, he raised the logistical problem of determining who is interested in a given matter. Sarnia's general solution is to release the council agenda at noon on Thursday prior to a Monday meeting; in addition the Mayor holds a news conference every Friday morning. Mr. McAleer observed that the standard of professionalism among clerks in smaller municipalities is much higher than that of reporters assigned to cover them, which means that the latter have very little difficulty obtaining information. In the larger centres, reporters must be of higher quality since they must probe behind the information provided by City Hall in order to get the complete story.

Mayor Brandt objected to Mr. McAleer's earlier contention that a road widening is of interest to everyone, not just to those living on the street to be widened. In Mayor Brandt's experience, the only objections to such proposals came from people in closest physical proximity to the construction. He repeated that there is simply no way of reaching 100 percent of the people, 100 percent of the time. Mr. McAleer countered that attendance at a public meeting called to discuss a road widening should not be taken as the only measure of interest in it; many people rely on the media to inform them about the issue.

Charles Bens of the Bureau of Municipal Research suggested that it was unhealthy for the media to play the role - or to be seen to play the role - of sole information agent for local governments. This situation would not prevail if councils would change their reluctance in informing the public. Among the methods they might consider for disseminating this information are printed flyers, cable television, and mobile City Halls. The experience of cities such as Dallas, Texas, that have used such methods to inform their citizens, is that they tend to be more supportive of city programs, and to contribute many worthwhile ideas toward program design and implementation.

Mayor Brandt again raised the "problem of logistics": how, he asked, could the information contained in the pound or so of paper required for each council agenda, be distributed to 55,000 residents each week? And how many would even be remotely interested in even one or two of the 30 items? He preferred to rely upon the press to select and write-up those items in which it supposed the public would be interested.

Mr. Bens responded that many items on each agenda are not new, but recur from month-to-month as part of a larger issue. The public needn't be given every detail of every agenda, but it could be kept up-to-date by periodic reports on these larger issues. These reports could include the likely dates on which council would be considering them. He predicted that one of the effects of such reports would be to encourage supporters of council proposals to turn up at council meetings, along with the opponents who can be expected in any case. As evidence, he again cited Dallas and its "Goals for Dallas Program".<sup>1</sup>

Jon Adamac, Windsor's City Clerk, noted that in some jurisdictions the Council agenda is published in its entirety in the local newspaper. In his view Windsor should at least publish the index to the council agendas in the newspaper. He suspects that one of the motives underlying the resistance by some elected and appointed officials and reporters to informing the public more fully, is to keep public meetings short by limiting public participation. If substantial numbers of the public become actively involved in public affairs on a regular basis, our public meetings would last far too long to please some of us.

<sup>1</sup> See J.R. Nininger, V.N. MacDonald and G.Y. McDiarmid, Goals for Dallas 'A': An Experiment in Community Goal Setting and Goals for Dallas 'B': An Experiment in Community Goal Setting (Toronto: Local Government Management Project, May 1975).

"Public Information and Public Administration: Conflicting Claims on the Public Interest"

Ron Wagenberg, Alderman, City of Windsor, and  
Professor of Political Science, University of Windsor

I approach this assignment with a considerable degree of ambivalence as to how it should be handled. It is called a keynote address and titled "Public Information and Public Administration: Conflicting Claims on the Public Interest".

Somehow the term "Keynote Address" reminds me of southern American Senators addressing Democratic Presidential conventions, doling out florid prose in measured cadence and, of course, in stentorian tones.

Accordingly, I wondered if my purpose was to present an exhortation for everyone to get out there and inform the public, blab those secrets all over the Province, leak those documents all over the country and generally pull back the curtains from the inner sanctums of decision-making.

It didn't take long to realize that you would not be interested in a Pollyanna telling you how much better the world would be if there was more public information when you know full well that there are conflicting claims on the public interest when it comes to the dispersion of information.

Another problem I have is that I don't know too many, or any for that matter, public information, public administration conflicting claims or public interest jokes or anecdotes. So I am denied the opportunity to fill a part of my allotted time with entertaining fluff.

This is indeed unfortunate in my case because I really don't have much expertise in the subject area of my address today. As you can see, however, that hasn't deterred me from showing up today. There are few professors who would pass up the opportunity to get a free lunch in exchange for delivering a few platitudes.

A final problem I have is deciding whether I should speak more as a political scientist interested in this particular area or a practicing politician who is called upon occasionally to make decisions on what should be public information and what should remain private.

I am in the position that whatever I might say today can be thrown back at me some day as testimony to my hypocrisy.

For, whatever general principles about public information and public administration Ron Wagenberg the political scientist might enunciate, these have to be applied in specific cases by Ron Wagenberg the politician, and judgement has to be used.

With reluctance, I accept the probability that whatever I say will be thrown up to me someday.

It is a cliché of our democratic system that its health is based on an informed public, participating in the public process at the very least by supporting one set of elected officials as opposed to another.

Even this limited goal is tempered by the tendency of large numbers of voters to make their decisions on bases other than a measured assessment of the issue orientations of candidates for election.

I might say this is most evident at the municipal level. Nonetheless the availability of information should not be underestimated as a key component in our political system. No matter how cynical we may be about the real relationship between the amount of information available to the public and the way in which decision-making is made in Canada, it is indisputable that there is a significant difference between here and totalitarian regimes where information is systematically suppressed and indeed falsified.

Recent decades have been characterized by developments which have magnified the problem of public information and public administration in at least three ways.

First, there is a great deal more that is publicly administered than was the case in previous times.

Second, the means to disseminate information more widely and more quickly have been achieved.

Third, there has been a growth, if not in the public as a whole, at least in various interest groups, in the desire to have access to information which affects their particular concerns.

It is hardly news that government has grown tremendously in the last generation. But it perhaps is well to reflect on the wider range of activities that the public now needs information about.

Extremely important activities have passed from the private sector to the public one.

Health care is one of these and in Ontario today a large portion of the electorate seeks information to understand the basis for hospital closings, the provision of services of one type or another (one thinks in Windsor, for instance, about the concern over the closing of obstetrical units), and of course there is universal concern about rates of OHIP premiums.

One could go on to note other specific areas such as welfare, housing, environmental matters etc., but it is enough to note that we have reached the point where government has some involvement in virtually every important aspect of life.

This is reflected in the fact that government expenditures now account for over 40% of the G.N.P. More personally, people may reflect on the income taxes, sales taxes and property taxes which they must pay in varying amounts.

It is surprising in view of this that there hasn't been much greater demand to know what is going on long before now.



The growth in government activity has been necessarily accompanied by a<sup>10</sup> burgeoning public service at the three levels of government.

Something like 12% of the work force is now directly employed by some government agency or other. This army of public servants, engaged in a great variety of activities, creates a great deal of information that needs knowing but paradoxically is itself often an impediment to the dissemination of such information.

As employees for instance they have a great stake in suppressing information whose publication would lead to public pressure for the end of their jobs or, if not that extreme, at least changes that would make things less comfortable for them.

The second development affecting public information is in the means to disseminate information. Here we are looking at the refinements in the print media and the emergence of the electronic media into a position of prominence. The means by which members of the public could have at their disposal virtually all the information they could consume is at hand.

Yet, having the means to propagate information does not ensure that all relevant information will be available to the media. There must be some means to distinguish relevant information from the irrelevant, and to choose information items which will reflect public events and decisions realistically. This responsibility rests to some large extent on the journalistic profession. The tension between elected and appointed public officials and journalists needs little underlining here.

Concern, and I would say proper concern, has often been expressed about the lack of training many journalists have had which would prepare them to be able to fit particular bits of information into a wider and clearer perspective of the real world.

This problem, however, can be solved relatively easily in the new generation of journalists now being trained, if we insist that they know more about the problems they are reporting on than whatever may be available on a daily basis. Hopefully, this will turn us away from the view that the world is a series of spectacular events rather than its reality which is a gradual procession of rather prosaic developments.

The third matter to which I alluded earlier is the concern of many groups that they have access to information relating to their particular interests.

More and more, interest groups are developing permanent staffs which interact with governments. These professionals are both competent to seek out the information which they need and to analyze that information. This in turn makes available to the membership of their groups more and better information. The wider public is also apprised of this information through the publicity efforts of these groups and through their interaction with the media. Groups such as these of course have their own axes to grind and thus are likely to present only information buttressing one side of any argument. The efforts of the Canadian Mining Industry, for instance, to use information to counter Federal taxation policies on them, do not include suggestions as to how revenue shortfalls would be recovered.

Interest groups and government agencies can easily find themselves in adversarial situations and this can lead to the public organizations becoming very restrictive in their information policies. Various law enforcement agencies are wary of groups such as the Canadian Civil Liberties Association. Public bodies ranging from local Public Works Departments to the Atomic Energy Corporation Limited would just as soon keep as much of their information away from environmental groups as possible. At times, a great deal of mutual mistrust may develop with each side believing its attitude towards information is more conducive to the public interest.

What I have said thus far indicates that there is much more public information in existence, that the means to disseminate it are highly developed although problems exist in defining what is important to disseminate, and that interest groups within the public are now making greater efforts to acquire and use public information. Whether my comments have made it clear or not, I believe that the trends towards distributing public information more widely are to be encouraged.

What then are the conflicting claims made on behalf of the public interest which would restrict the publication of various forms of public information?

It is relatively easy to identify some of these areas especially at the national level. National security demands a certain amount of secrecy in matters that have to do with the military particularly during wartime. National security has also been invoked to suppress information that deals with monitoring and counter-battling activities that are defined as subversive and aimed at the stability of the State.

As the contemporary Royal Commissions dealing with the activities of the RCMP would indicate, there can be a great deal of controversy over how widely the national security concern should be used to justify covert and in some cases even illegal activities. Here we have a perceived conflict between the administration of the law enforcement function and our traditional view of the public's right to know what is going on.

Another area where secrecy is a necessary part of our parliamentary tradition both at the national and provincial levels, is the preparation and submission of annual budgets. Here, we have a situation where the publishing of information prematurely can give unfair advantage to the interests of some parts of the community and prejudice the interests of others. Indeed, the provision that most taxation proposals take effect immediately is meant to forestall the possibility that certain sectors of the community can take action to avoid the intended effects of the tax measures. Of course, if the opportunity were provided by public information beforehand, affected parties would obviously take what steps they could to counteract or avoid the effects of new policies on them. It is for this reason that a furore broke out during Walter Gordon's time as Finance Minister when he engaged the services of outside personnel to help develop the Federal budget. A major concern was expressed that people outside the regular public service had access to such sensitive information.

More recently there was a serious situation when John Reid, then Parliamentary Secretary to the Finance Minister was accused of leaking information regarding tax changes affecting pleasure boats to people in that industry in his riding.

Eventually, he was able to clear himself but the episode indicates that in this area of public administration the public interest is best served by secrecy rather than publication.

Here we have a great irony in that although the public normally would have the right to know what the government has in store for it, the government's ability to make its economic plan work is in at least some respects dependent on people not knowing what is going to happen. Accordingly, we have an instance of the conflict between public administration and public information being decided without hesitation in favour of secrecy.

At this point I would like to turn to the municipal field. Here I can speak from the viewpoint of a participant-observer, to use a term which designates one approach to research in political science. I thought it was about time that I called upon the jargon of my discipline.

I would imagine that the practice in Windsor is reasonably typical of other municipalities. Here we designate three issue-areas where information is to be kept confidential. These are property acquisition, litigation, and personnel. It is perhaps rather obvious why secrecy is necessary in these areas but I will deal with them briefly in any case.

Public disclosure of the city's interest in certain properties, and even more important perhaps, the amount the city would ultimately pay, would obviously harm the public interest as it is represented by the public purse. It is certainly not in the public interest for a municipal government to stimulate land speculation. Obviously this cannot be entirely avoided but it should be discouraged especially when it is the taxpayer who would suffer from such speculation. It might be noted at this point that public information disclosed through public reports tends to be known by small interest groups rather than the community as a whole. Unfortunately at times these small interest groups may in any case become informed of matters that ought not to be known to them.

When the city is party to litigation, it is again in the public interest to prevent the other party in the case from knowing the city's position before it unfolds in court. No one could rationally suggest that a discussion on what kind of settlement could take place out of court could possibly be held in public. This particular conflict between public information and the public interest is easily settled on the side of secrecy.

Last is the question of personnel matters. This has macro and micro aspects. On the macro side is the question of negotiating union contracts and here it is necessary to maintain a high degree of secrecy. On the micro side, we are dealing with the individual employees and the question of their right to privacy arises. Here we have another fairly easy conflict to resolve and it is resolved on the side of nondisclosure of information to the public.

Although these three issue-areas seem easy enough to isolate, secrecy problems can and do arise with regard to them. It is difficult indeed at times to discuss such issues without raising questions which undoubtedly should be debated in the public limelight. It must be admitted that it can become all too easy to rationalize secret discussions of matters that ought to be publicly debated by finding some tenuous relationship to property litigation or personnel. Something might lead to litigation, something might have to do with a particular

employee etc. It certainly cannot be denied that both politicians and administrators have no urge to discuss their mistakes in public and it wouldn't take much imagination to construct a case for an in camera meeting.

In Windsor's case an honest attempt is made to avoid this by debating the propriety of having an item on the secret agenda. Anyone who objects to a matter being secret is obviously in a position to make it public. If all members of council agree the matter ought to be kept from the public then the odds are that a pretty good case can be made for that decision. I say this is in the full knowledge that groups can become clubbish and view themselves as being in a state of siege against the public. Nevertheless it boils down to a matter of judgement and I can honestly say that in my experience the council I serve on has tried to exercise that judgement responsibly in the public interest. There can be no doubt that others will view that judgement as faulty on some occasions but that is a situation that no political system can ever eliminate.

With regard to personnel situations, they can, at the upper level of administration, involve partings of the ways because of policy disputes. The employee is always free to speak his or her mind but the municipality may be unable or unwilling to disclose the reasons for a termination. Public speculation always accompanies major upheavals of key personnel and the determination of how full a disclosure of the ingredients of the situation ought to be made is never easy.

Having argued that most public business with few exceptions should be available for digesting by the electorate I am still left with a vital question. This involves the determination of the point at which information has been developed so fully that it ought to be made available. Should it only be the final report from administrators to their political masters which is subject to publication? Or should administrative memoranda at a much earlier point of policy definition or decision-making be in the public domain as well. This is not an easy question to answer. On the one hand one must ask if administrators can operate effectively in a fishbowl and whether the public interest will be served if they are expected to do so. On the other hand one might argue that perhaps a wider variety of opinions and ideas might be available to the public to help them to determine if the final report has considered all reasonable options.

It should be kept in mind that it is not only the public which may have certain facts and opinions kept from it, even elected officials can be left uninformed if administrators feel strong enough to do so. A few years ago, I chaired a committee reviewing the city manager system in Windsor and one recommendation of that committee which council accepted was that all reports of department heads would go to council and if the city administrator disagreed he would note his disagreement rather than suppress the report. This I believe is an important step forward in supplying public information about the decision-making process. It could be argued I suppose that internal communications within departments could also add to public awareness but here again we come to a point where judgement must be used lest the desire for openness leads to a situation where the decision-making process becomes unduly cumbersome.

If it is granted that the most information is to be available to the public, problems of mechanics have still to be overcome. How many copies of reports should be available? Enough to service the local media who in turn would inform the general public or large numbers of copies that would be there for all interested citizens? What price tag if any should be placed on the public's right to know? Problems of storage of materials and their accessibility to members of the public would have to be worked out if any large number of people wanted to seek out public documents. According to one former official in the Prime Minister's Office, the Privy Council has adopted the policy of marking most documents secret because it would be too costly to hire the staff to make realistic judgements on the thousands of documents that they handle. To get back to the local level it is unlikely that the public in its present cost-cutting mood would be anxious to see any cost increases in the Clerk's department, even to service increases in publication of information.

There is no doubt that the public interest is sometimes served by the suppression of information which, if it were available to some members of the public, would cost the taxpayer money or even threaten his security. Nonetheless for the most part the public has a right to know what is being done in its name. It has the right to have access to the facts upon which decision-making is based. It has a right to expect that any suppression of information will be in its interests and not in the interests of incompetent administrators or gutless politicians.

In our democratic system, it is elected representatives who are charged with the responsibility of deciding what is in the public interest. I know of no system which can eliminate this need for judgement. An aware public can help to ensure that this judgement will be exercised skilfully. An aware public is a function of an untrammelled flow of information. I am confident that we are in the process of reaffirming that old democratic truth. Competent administrators and well-intentioned and intelligent politicians have nothing to fear from this development.

#### SECTION IV: FREEDOM OF INFORMATION: WHAT ARE THE LOCAL RESPONSIBILITIES?

Chairman: Trevor Price, Vice-Chairman, I.P.A.C.-Southwestern Ontario, and Professor of Political Science, University of Windsor

Panelists: Stan Makuch, Professor of Law, University of Toronto, and Researcher for the Williams Commission on Freedom of Information  
Jon Adamac, City Clerk, City of Windsor  
Bill Conklin, Faculty of Law, University of Windsor

##### Stan Makuch

Stan Makuch's presentation was devoted largely to describing the project he, and two other researchers, had recently undertaken for the Williams Commission.

The aims of the project were: (1) to determine what practices prevailed among Ontario's local governments regarding the dissemination of information for decision-making purposes; and (2) to make recommendations regarding these practices. A time limit of four months dictated that not all municipalities could be surveyed, and that the project team had to restrict its interest to certain types of documents. Accordingly, 11 municipalities were chosen to be roughly representative of Ontario's 840-odd local government jurisdictions. And the research was restricted to reports and documents used by councils and their committees, and by special purpose bodies, that related to planning, policy-making, education, and budgeting. The team's main questions concerned the degree of public access to these materials and to meetings of decision-making bodies, the ease with which the local decision-making bodies could get such information from municipal staff, and the role of the Ontario Municipal Board (OMB).

In the matter of existing practices, Mr. Makuch's research group found: (1) that municipal information disseminating practices were anything but uniform. They ranged over the entire open-closed spectrum, from discussing virtually all business in public to discussing virtually everything in camera, from freely circulating virtually all relevant information among those interested, to severely limiting access to such information even to decision-makers themselves; (2) that "openness" was not a function of formal legislation or policy in the most open municipalities, but merely a matter of practice; (3) that public opinion as expressed by the press and by citizen groups appeared to be instrumental in determining the prevailing practice in a municipality; (4) that existing Provincial legislation provides little, if any, guarantee of access to information held by local government; and (5) that each local government has complete discretion to decide the balance between the need for public access to information and the need to safeguard the interests of the municipal corporation and of individuals (e.g. privacy).

Mr. Makuch's group made 120 recommendations in its final report, all of which obviously could not be discussed. Here are a few of the major recommendations. First, that the Province legislate a framework that provides for general public access to local government information and meetings and in which matters involving the following are exceptions: (a) local government personnel; (b) contract negotiations involving public servants; (c) property transactions in which the municipality is a party; (d) litigation; (e) the election of a warden, or a

chairman of a standing, or an executive, committee; (f) certain police business; (g) school records; and (h) information received by local government bodies that does not occasion a vote. The second major recommendation was that municipalities be required to adopt a freedom of information policy that would be approved by a body such as the OMB. Mr. Makuch's group reasoned that obtaining a commitment from the municipality in the form of a policy statement would counteract any tendency to interpret the exceptions to access too widely.

#### Jon Adamac

Jon Adamac began his presentation with a reading of Section 216 of The Municipal Act which deals with public access to information held by a municipality. He went on to argue that the legislation is quite inadequate largely because it leaves too much room for discretion. What is needed is more-clearly worded and more-specific legislation that both lessens the opportunity for personal discretion on the part of municipal staff, and broadens the scope of public access. He disagreed explicitly with Mr. Makuch both on the types of proceedings and documents from which the public ought to be excluded and on the effectiveness of the freedom of information policy statements that Mr. Makuch's team would require of municipalities. With respect to the former he argues, for example, that the public need not be excluded from council discussions of most property matters. He wasn't persuaded by the hypothesis that public disclosure of property matters in progress would lead to land speculation which would cost the taxpayers dearly. He pointed out that early disclosure of the municipality's interest in a property could discourage speculation by structuring the proceedings before the Land Compensation Board so as to disregard inflated prices paid for land following an announced interest by a municipality. It is generally accepted that it is difficult, if not impossible, to maintain confidentiality when land transactions are discussed in closed meetings of municipal councils. Speculation is more apt to occur when only "a few" outsiders know of the impending transaction. When everybody knows speculation will probably not occur. In his view, a City's powers to expropriate a property at a fair market value made it impossible for the seller to fleece the public by artificially inflating his selling price. He stated that in order to make the open meeting concept acceptable for land transactions it would also be necessary to accept the principle that persons whose property is being expropriated are entitled to a fair market price and that bargaining should be limited to the appraisals of the property.

Mr. Adamac also discussed Windsor's policies with respect to access to information, which policies he feels are as "supportive" of "openness" as any to be found. With respect to current matters of council business the contents of "controversial" documents are never reported or released to the press or public before they appear on the Council Agenda. He noted that the classification of a document as "controversial" was necessarily a personal judgement which he often arrived at with the help from the Solicitor and Department heads. Windsor's policy is to release to the public any document submitted in support of an agenda item that is discussed in open council, although The Municipal Act does not require such disclosure. Council decides openly, as its first item of business, which agenda items it will discuss in camera. Once council has decided a matter, its decision is entered on an index, as are all policy resolutions and by-laws. This index is made available to persons seeking information from the City. Besides making it easier for them to request information, it reduces the time taken by staff to retrieve the requested information.

time taken by staff to retrieve the requested information. Mr. Adamac urged those requesting information, especially reporters, to understand that the Clerk's Department does not have unlimited resources to devote to handling their requests; that on occasion they would be delayed or simply not accommodated for that reason.

#### Bill Conklin

Bill Conklin focussed upon federal government policy toward the freedom of information issue, with the object of drawing some lessons for the formulation of provincial and municipal policy.

He began by discussing the provisions of Part IV of the Canadian Human Rights Act, which deals with access by an individual to government-held information about him or her. Part IV and Regulations under it require the Federal government to publish, at least yearly, an index to all of its information banks, which are reported to number about 1,500. The index is to detail, for each bank, the office or officer responsible for dealing with requests for information, the type of records kept and their derivative uses, and the demographic or geographic classification.

Under Part IV and its Regulations, the individual has the following statutory rights:

1. to request a Government officer to ascertain whether a federal information bank contains a record of personal information concerning him;
2. to request a Government officer to let him have access to the information;
3. to ascertain a general description of the uses to which the record has been put since the coming into force of the Act;
4. to have a Government institution arrange for a person to help him understand the record where the record is difficult for the individual to understand;
5. to request a Government officer to correct information in the record;
6. to require that a notation of his requested correction be placed on the record; and
7. to bring a complaint to the Privacy Commissioner.

Furthermore, the individual must be allowed to examine his record in person and he must be provided with a copy of his record at no cost to him.

Finally, the individual must be consulted on, and consent to, any non-derivative use of his record by a public servant that is not authorized by law. It should be noted that an individual may request information from only one information bank at a time and that all requests must be in writing.

Part IV, as implied above, also establishes a Privacy Commissioner to investigate appeals arising out of requests for information and to report on them, at his or her discretion, to a designated Cabinet Minister and to Parliament.

Mr. Conklin then raised a number of critical questions regarding Part IV and its Regulations. Is the access policy likely to be effective if an individual must complete 1,500 written requests for information one at a time? Given the number of reports tabled in Parliament, are those of the Privacy Commissioner likely to be effective in releasing requested information? Should there be provision in the legislation for an ultimate appeal to the courts?

Mr. Conklin then, addressed the issue of access to reports and documents relating to various policies of the Federal government.

He approached this question by reviewing a Green Paper published by the Secretary of State in June, 1977. That Paper recommends an access policy that would eventually apply to all departments and to some Crown corporations. As the recommended policy is most notable for its limitations on public access, seven of its nine exemptions were spelled out in detail as follows:

"those documents, the disclosure of which, or the release of information in which might

- (i) be injurious to international relations, national defence or security or federal-provincial relations;
- (ii) disclose a confidence of the Queen's Privy Council for Canada;
- (iii) disclose information obtained or prepared by any government institution or part of a government institution, that is an investigative body:
  - (a) in relation to national security,
  - (b) in the course of investigations pertaining to the detection or suppression of crime generally, or
  - (c) in the course of investigations pertaining to the administration or enforcement of any Act of Parliament;
- (iv) disclose personal information as defined in Part IV of the Canadian Human Rights Act or threaten the safety of any individual or disclose correspondence between a member of the public and a Member of Parliament or the government;
- (v) impeded the functioning of, or the examination of a case or issue before, a court of law, a quasi-judicial board, a commission or other tribunal, or any inquiry established under the Inquiries Act;

- (vi) disclose legal opinions or advice provided to a government institution or privileged communications between lawyer and client in a matter of government business;
- (vii) disclose financial or commercial information which:
  - (a) would jeopardize the position of a government institution in relation to contractual or other negotiations or the position of any other party to such negotiations or,
  - (b) would result in significant and undue financial loss or gain by a person, group, organization or government institution, or
  - (c) would affect adversely a person, group, organization or government institution in regard to its competitive position."

The Green Paper recommends two further exemptions. The one would exempt inter-agency or intra-agency memorandums or letters which would not otherwise be available by law to a litigant in the courts. The second would exempt documents, the disclosure of which "might be prohibited by any federal enactment".

The Green Paper opposes the judicial review of requests for information that are denied. However, it does give favourable consideration to several review options, which include: (1) "an information auditor" who would investigate the cases of denied applicants and file an Annual Report on them to Parliament; (b) "an information commissioner with advisory powers" who could attempt conciliation between the parties, and who could make recommendations to the Minister concerned and to Parliament; and (c) "an information commissioner" with power to order the release of information.

Finally, the Green Paper would have the individual bear the cost of copies of government documents supplied to him, and it would have the government more clearly differentiate between information classification procedures used to counter-espionage and those used for other purposes.

The primary question raised for Mr. Conklin by the Green Paper was this: "Are the enumerated exemptions so vague, so broad, and so numerous that they undermine the expressed purpose of freeing information?". He then posed a number of supplementary questions - about the meaning of "national security", for example - that implied an affirmative answer to the larger question.

Finally, Mr. Conklin challenged the rationale of the Green Paper for restricting public access to government research studies and policy reports. He expressed doubts that increased public scrutiny would expose public servants to "controversy and political attack" thereby jeopardizing their neutrality. Nor does he think that it would diffuse responsibility to the point of diminishing the power of Parliament and of the individual MP. In Mr. Conklin's view, the withholding of policy-relevant information from the public, renders the public powerless to hold its elected officials to account.

Impact of Freedom of Information Legislation

Michael Fenn, a Provincial civil servant, wondered whether anticipated freedom of information legislation would have the effect of reducing written communication among civil servants at both the provincial and municipal levels. He suspected that he would be inclined to do more internal business over the phone or in person to reduce the possibility of involvement in litigation. Mr. Makuch recognized the problem but thought it could be minimized by adopting (in municipal government) the rules that any report that goes to a political decision-maker, and any factual information in a report has to be made public.

Mr. Conklin thought that this rule seemed effective on its face, but added that freedom of information legislation has had the effect in the United States of increasing oral communication in the civil service. He cited the United States freedom of information practice that exempts inter- and intra-departmental documents and reports based on a solicitor-client relationship. These exemptions, together with increased oral communication, have rendered the U.S. legislation ineffective. The solution, in his view, is not to have the exemptions.

Lloyd Brown-John of the University of Windsor made three comments on different aspects of the presentations to the effects: (1) that the costs of implementing freedom of information legislation are formidable; (2) that informing the public of the affairs of municipal councils should not be limited on the grounds of time and money, for democracy is an expensive form of government; and (3) he recalled an outbreak of encephalitis several years ago in Windsor. In that case, he argued, there was much information that should not have been disclosed because of its potential for inciting fear and panic.

Andy Sancton and Warren Margnusson, both of the University of Western Ontario, took issue with Mr. Makuch's proposal that the election of committee chairmen and wardens be allowed to be conducted in camera. They argued that this proposal amounted to de-politicizing the most political events in the process of municipal government. They saw no problem in making public Council's divisiveness, citing in support the rifts occasioned by federal and provincial leadership conventions, which rifts healed in time at an acceptable cost.

We noted in the Introduction that the main purpose of the seminar was to provide a forum for raising and discussing a number of questions relating to its two main themes, namely, relations between local government and the media, and public access to government-held information. Given the complex nature of the questions and the short time allotted for their discussion, the resolution of any one of them would have been surprising - and probably less than adequate. We are, then, more or less pleased to report that there were no surprises at the seminar.

There were, however, a number of comments and suggestions made at the seminar which we would like to consider briefly in closing. Although the views to be expressed below may be shared by certain of the seminar participants, responsibility for them rests solely with the Bureau of Municipal Research. In some cases, moreover, they derive from research and observations not directly connected with the Windsor Seminar. One such non-seminar source is our 1976 Toronto conference on local government and the media.<sup>1</sup>

How do the media and local government relate to each other? How should they? The interactions between media and government are so varied that one-word answers to these questions are obviously inadequate. The choice "Associates or Adversaries?" offered in the printed program was properly taken by seminar participants to be a simplification for rhetorical purposes. They tended naturally to approach these larger questions by reducing them to component situations.

An instance of this was the question of the collusion between the Kitchener newspaper and the Kitchener Council to keep the redevelopment plans for the farmers' market from the public. From this issue, the questioner drew the lesson that the media ought not to accept invitations to closed meetings; Mr. McAleer disagreed, saying that media can usually devise a way of disclosing the contents of such meetings to the public, presumably without breaching the trust of the public officials involved. In our earlier research in Toronto, we found support for each of these positions in the policies of the Globe and Mail and of the Star respectively.<sup>2</sup> In order to discourage its reporters from becoming too chummy with politicians, the Globe instructs them not to participate in discussions that cannot be reported. In our view, the Globe's Policy is to be preferred, for it is the one most likely to preserve mutual respect between the media and local government once it is attained. Although they were conspicuously labelled "exceptions", the mutual complaints of ignorance and incompetence voiced at the Windsor seminar suggest that this mutual respect between journalists and public officials needs strengthening in southwestern Ontario. The policy of reporting information gained from public officials in confidence may not constitute a formal or legal breach of trust; but it hardly seems likely to engender mutual respect.

<sup>1</sup>BMR Civic Affairs, "The News Media and Local Government", August 1976.

<sup>2</sup>"The News Media and Local Government", p. 10.

A number of other requisites of mutual respect were touched upon during the seminar. These included: better-trained and better-informed reporters with more time to research their stories; better-informed politicians; and a greater appreciation by seekers of municipally-held information (1) that municipal employees have other things to do besides respond to the requests of the former and (2) that a municipal clerk's budget for information searching and dissemination is fixed. The complaints implied by each of these requirements are quite straightforward and should be readily allowed by both sides; any argument between them must ultimately come down to a question of degree.

There was, however, another suggested requirement for a relationship of mutual respect that may not be so readily accepted. This was the suggestion that local government should rely much less on the media to inform the public of its affairs or, in other words, to act as the municipality's information agent. The media could then devote more attention to the critical analysis of those affairs and to proposals for their improvement. It is a commonplace, for instance, that journalists' questions of public officials tend to be low-level "what?" questions, rather than probing "why?" questions. If local governments would take much more responsibility for presenting their own case to the public, the media would be better able to play the valuable role of public skeptic. It is this institutionalized media skepticism that leads so often to comparative analyses of alternative policies, and to new policy ideas. The Bureau has found that both local and provincial politicians in the Toronto area look to the metro media, especially the newspapers, for such ideas, and are often influenced by them.<sup>1</sup>

In contrast, we find the major newspapers in southwestern Ontario both less observant of municipal affairs, and less inclined to offer constructive policy analysis on a regular basis. Perhaps this is because major centres in the region have only one daily newspaper in a position to observe local government closely. If this is the case, it strengthens our argument that municipal governments should take concerted action to inform their constituents regularly and directly of municipal activities.

There are many effective ways available for conducting an information program. Indeed, most municipalities in southwestern Ontario now employ one or more of them, although no municipality can be cited as an example for others to follow. These means include: buying (or accepting complimentary) newspaper space or radio/television time (for announcing agendas and reporting highlights of proceedings); televising council/committee/commission meetings on cable TV; holding community meetings in various parts of the municipality; calling regular press conferences and issuing press releases; distributing information with tax and other notices;<sup>2</sup> and the establishment of a municipal information and reference index or a municipal reference section in the public library. It is appropriate to respond briefly to the likeliest objection to this proposal in

<sup>1</sup> See "News Media and Local Government", P. 51, for example.

<sup>2</sup> A valuable recent source of guidance in these matters is Financial Disclosure to the Public: A Code for Municipalities in Ontario, prepared in 1978 by the Municipal Budgets and Accounts Branch of the Ministry of Intergovernmental Affairs and available from the Ontario Government Bookstore.

these times of fiscal restraint, namely, its implied costs. Although this objection raises complex questions of priority-setting and political philosophy, we will limit our response here to the words of one of the seminar participants: "Democracy costs money".

We turn now to the seminar's second major theme, freedom of information. This was interpreted to mean the existing or desirable degree, either of individual access to personal information held by government, or of public access to policy-related government information and governmental decision-making proceedings. Our remarks here will concern the latter only.

As with the topic of media-government relations, easy generalizations are apt to be unhelpful. Mr. McAleer's charge that confidentiality has become a "fetish" of municipal governments should be seen, then, as a statement of frustration rather than of fact. Nonetheless, recent examples of evidently unwarranted local government secrecy are so ready to hand, that corrective action, perhaps along the lines proposed by Mr. Makuch, is definitely warranted. As Mr. Adamac made clear, present provincial legislation directing municipalities in the handling of requests for information is unacceptably loose and ambiguous. At present, the overriding factor in governmental decisions to release or withhold a requested document is the predisposition of the civil servant(s) fielding the request. Clear and comprehensive provincial legislation should not be expected to remove all scope for administrative discretion in such cases; we would hope, however, that it will foster a general predisposition among public officials to favour openness in government.

Toward this end, we specifically endorse the rule proposed by Mr. Makuch that all documents made available to elected municipal decision-makers be accessible to the public as well. If this rule is to be effective its exemptions must, as Mr. Conklin argued, be few and narrow. A standard list of such exemptions has recently evolved. It surfaced in several presentations at the seminar and appears now to have the status of "conventional wisdom". Its main categories are property, personnel, litigation and wage negotiations. Along with Mr. Adamac, we are hesitant to accept property matters as an exemption. We agree with him that municipalities can use their powers of expropriation to thwart would-be speculators. It is after all, the threat of speculation at the public's expense that is most often used to justify confidentiality in property matters. Perhaps, then, only selected property matters should be exempt from public scrutiny.

Another questionable proposed exemption is the selection of chairmen of executive and standing committees of council. Mr. Makuch's argument, that these selections should be conducted in camera in order to contain any divisiveness which may attend them, is not persuasive. Why should divisiveness at the local level of government be regarded differently than it is at the provincial and federal levels?

It is clear that the practical breadth of each category of exemption will depend largely on the legislative provisions finally adopted. We expect that there will be many opportunities for interested parties to influence the formulation of these provisions in the coming months.

In the interim, however, we strongly recommend Windsor's current practice for determining which items on the Council Agenda will be discussed in camera. As its first item of business Windsor Council considers, in open session, each item the City Administrator has earmarked for in camera discussion, and endorses or rejects the designation in each case. Unfortunately, there does not appear to be a similarly simple procedure that we might recommend in the matter of access to documents.

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March, 1978

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THE PUBLIC INTEREST AND THE RIGHT TO KNOW

BMR-IPAC SEMINAR

OCTOBER 8, 1978

CLEARY AUDITORIUM, WINDSOR, ONTARIO

9:30 am Registration

10:00 am GOVERNMENT AND THE MEDIA: ASSOCIATES OR ADVERSARIES?

Chairman: George Vance, Co-ordinator, Southwestern Regional Office,  
Bureau of Municipal Research

Panelists: Andy Brandt, Mayor of the City of Sarnia  
Robert McAleer, Managing Editor, The Windsor Star  
Les Mather, Reporter, CBE Radio, Windsor

12:00 noon Reception

12:30 pm Luncheon

1:15 pm Keynote Address

Ron Wagenberg, Alderman, City of Windsor, and  
Professor of Political Science, University of Windsor

"Public Information and Public Administration: Conflicting Claims on the Public Interest?"

2:00 pm FREEDOM OF INFORMATION: WHAT ARE THE LOCAL RESPONSIBILITIES?

Chairman: Trevor Price, Vice-Chairman, I.P.A.C. - Southwestern Ontario,  
and Professor of Political Science, University of Windsor.

Panelists: Stan Makuch, Professor of Law, University of Toronto, and Researcher for  
the Williams Commission on Freedom of Information  
Jon Adamac, City Clerk, City of Windsor  
Bill Conklin, Faculty of Law, University of Windsor

4:00 pm Informal discussion

5:00 pm Adjournment



## CORPORATE

Allstate Insurance Company of Canada  
Bank of Montreal  
Bank of Nova Scotia  
Bell Canada  
Board of Trade, Metro Toronto  
Bramalea Consolidated Development  
Brascan Limited  
Cadillac Fairview Limited  
Canada Malting Co. Ltd.  
Canada Packers Foundation  
Canada Permanent Trust Co.  
Canadian Imperial Bank of Commerce  
Commonwealth Holiday Inns of Canada Limited  
Confederation Life  
Consumers' Gas Company Ltd.  
Costain Limited  
Crown Life Insurance Co.  
Dofasco Ltd.  
Donlee Manufacturing Industries Ltd.  
Dominion of Canada General Insurance  
Four Seasons Hotel Limited  
General Mills Canada Ltd.  
Group R  
GSW Limited  
Guaranty Trust Co. of Canada  
Gulf Realty Co. Ltd.  
H.U.D.A.C. (Ontario)  
I.B.M. Canada  
The Imperial Life Assurance Co. of Canada  
Independent Order of Foresters  
Jackman Foundation  
Kodak Canada Ltd.  
Koffler Stores Ltd.

John Labatt Ltd.  
A. E. LePage Ltd.  
Lever Brothers Ltd.  
3M Canada Ltd.  
Maclean-Hunter Publishing Co. Ltd.  
Manufacturers Life Insurance Co.  
Maple Leaf Mills Limited  
Marathon Realty Company Ltd.  
L. J. McGuinness and Co. Ltd.  
Metropolitan Trust Co.  
The National Life Assurance Company of Canada  
Noranda Mines Ltd.  
North American Life Assurance Co.  
Northern and Central Gas Corp.  
Parking Authority of Toronto  
The Royal Bank of Canada  
Royal Insurance Company  
Royal Trust Co.  
Samuel Son & Co. Ltd.  
Sheraton Centre  
Robert Simpson Co.  
Simpsons Sears Ltd.  
Steel Co. of Canada  
Sunoco Inc.  
The Toronto-Dominion Bank  
Toronto Star Ltd.  
Trans Canada Pipe Lines Ltd.  
Turner and Porter Funeral Directors Ltd.  
George Weston Ltd.  
Wood Gundy Limited  
Xerox of Canada Ltd.

## PROFESSIONAL

Ernest Annau, Architect  
Armstrong & Molesworth  
Arthur Andersen & Company  
Bird & Hale Ltd.  
Barton-Achman Canada Limited  
John Bousfield Associates  
Mary Collins Consultants Ltd.  
Costa, Thurley, McCalden and Palmer  
Currie, Coopers & Lybrand Ltd.  
Deacon (F. H.) Hodgeson Inc.  
Development Engineering (London) Ltd.  
A. J. Diamond Associates  
M. M. Dillon Limited  
Goodman and Carr  
Govan, Kaminker, Architects and Planners  
Eric Hardy Consulting Ltd.  
I.B.I. Group

Jarrett, Goold & Elliott  
Judicial Valuation Co.  
Marshall Macklin and Monaghan  
Russell J. Morrison  
Murray V. Jones and Associates  
Norman Pearson, Planning Consultant  
Ontario Real Estate Association  
Osler, Hoskin and Harcourt  
Peat, Marwick and Partners  
Price Waterhouse & Co.  
Proctor and Redfern Group  
P. S. Ross & Partners  
Smith, Auld & Associates  
Stamm Economic Research Associates  
Toronto Real Estate Board  
Weir and Foulds  
Woods, Gordon & Co.

## GOVERNMENTAL

Reg. Mun. of Durham  
Borough of East York  
Edmonton City Parks and Recreation  
Borough of Etobicoke  
Etobicoke Board of Education  
Township of Gloucester  
City of Hamilton  
Reg. Mun. of Hamilton-Wentworth  
City of Kingston  
Metropolitan Toronto  
Metropolitan Toronto Separate School Board  
Ministry of State for Urban Affairs  
Ministry of T.E.I.G.A.  
City of Mississauga  
Township of Nepean

Reg. Mun. of Niagara  
Borough of North York  
City of Oshawa  
City of Ottawa  
Reg. Mun. of Ottawa/Carleton  
Reg. Mun. of Peel  
Town of Richmond Hill  
City of St. Catharines  
City of Sarnia  
City of Sudbury  
City of Toronto  
Toronto Board of Education  
Town of Vaughan  
City of Windsor  
Borough of York  
Reg. Mun. of York

## LABOUR

Labour Council of Metropolitan Toronto  
Ontario Federation of Labour  
Sudbury and District Labour Council

200 Personal/Academic Membership,  
including Libraries