



October 15, 2012

To whom it may concern,

Cadillac Fairview has been made aware of recommendations put forth by the General Manager, Economic Development and Culture regarding the issue of statutory holiday retail shopping in Toronto. The General Manager recommends that *"City Council amend the Municipal Code, Chapter 510, Holiday Shopping to permit all retail business establishments within the City of Toronto to open on Victoria Day, Canada Day, Labour Day and Thanksgiving Day anytime between the hours of 10:00 AM and 6:00 PM; And that All other provisions of Municipal Code, Chapter 510, Holiday Shopping, remain in force."*

As the owner and manager of three large, urban shopping centres (Fairview Mall, Shops at Don Mills and Sherway Gardens) that presently cannot open on statutory holidays, we are disappointed in this recommendation, simply because these centres are still at a disadvantage with some statutory holidays. Shopping centres and retail operations with exemptions to the current regulations (both in Toronto and other municipalities) have enjoyed a competitive advantage and will continue to do so if this recommendation is passed.

We feel that all owners/managers should have the same opportunity when it comes to operating their business. We believe that permitting owners/managers of retail operations to open on statutory holidays is a fair and equitable application of the law, regardless of geography.

As strong advocates of consumer choice, Cadillac Fairview believes that customers should ultimately determine when and where they can shop. Furthermore, allowing operations on statutory holidays is the logical continuation of a process that began many years ago with relaxing of Sunday shopping restrictions by the Courts.

We respectfully request that you reconsider these recommendations. In our opinion, they represent half-measures in addressing the fundamental issues which we previously identified and shared with the committee during the consultation period.

Sincerely,

Martin Wray  
Vice President, Property Operations  
The Cadillac Fairview Corporation Limited