



November 18, 2013

Councillor Peter Milczyn and Members of the
Planning & Growth Management Committee
10th Floor West, City Hall,
100 Queen Street West,
Toronto, Ontario,
M5H 2N2

Attention: Ms. Nancy Martins

Re: November 21, 2013 Planning and Growth Management Committee meeting

Dear Councillor Milczyn and Members of the Planning and Growth Management Committee,

I am writing on behalf of Atlantic Packaging Products Ltd. asking the committee to support the recommendation of the staff report dated November 5, 2013.

Atlantic Packaging is an employer directly in the City of Toronto. Within the city we have 7 sites representing over 1.5 million square feet of manufacturing, 1000+ above average paying jobs, and revenues to the city in the millions of dollars in taxes, water and electricity.

The staff recommendations take an important step in trying to protect employment lands. Our operations for the most part operate 24hrs per day 7 days a week. As part of normal operations there will be traffic, noise and potential emissions such as steam or odours 24 hours a day. Although we endeavour at all times to be in compliance with all laws and regulations our operations often require a buffer from residential and other sensitive uses so not to have some people get annoyed and object.

Sensitive Uses: Residential, schools, places of worship etc... are all considered sensitive uses by the Ministry of the Environment. Once a manufacturing site is within proximity of a sensitive use they apply a different and more onerous standard for environmental compliance (such as a 45dba noise limit at night). These "sensitive use" standards often make it difficult to ensure compliance and if there is an excursion above limits puts the industry in an illegal or chargeable position. These more onerous conditions are often written into the industries Certificate of Approval to operate in the province. This puts considerable more risk on the effected industries and has the potential effect of reducing or stopping investment of existing industry as well as deterring new industry from siting.

Buffer zones: Industrial operations often run around the clock and through weekends. With them is traffic coming both to and from the sites, noise from operations and traffic, and other potential emissions that may be found annoying to some people. Even if a company is operating within standards and regulations if someone complains, as good corporate citizens, and as good councillors or provincial officers there will be an expectation to address these concerns. Without proper buffers we magnify the chance of these conflicts and often solutions are not available or very expensive on the industry.

Finite Resource: Employment lands in Toronto are a finite resource. It is relatively easy to allow a new condo or other sensitive use in or abut an employment zone but it renders a significant area questionable to industry. As existing employment lands are converted and encroached upon it is very unlikely they can ever be converted back to employment purposes.

In conclusion I ask again for the Planning and Growth management Committee to support the staff recommendation with regards to the protection and preservation of our employment lands and hold firm on denying conversion requests. Stability and good land use policy are essential to keep existing industry and attract new.

Yours Truly,



Todd Kostal
Director Purchasing and Logistics
Atlantic Packaging Products Ltd.