



EX10.23.1

**WING'S FOOD PRODUCTS**

50 Torlake Crescent, Toronto, Ontario M8Z 1B8

Phone (416) 259-2662 Fax (416) 259-3414

www.wings.ca

November 30, 2015

Secretariat Contact Jennifer Forkes  
10th floor, West Tower, City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

**Subject: NEGATIVE IMPACT OF STACKED INDUSTRIAL SURCHARGABLE PARAMETERS**

Wing's Food Products has been operating in the City of Toronto for more than 60 years and we are writing to express our concern about the proposed change to the surchargable parameters. We believe that these proposed increases are a disproportionate load on industry and make operating in the City more expensive and less competitive.

As a responsible corporate citizen, Wing's has invested significant capital to develop and implement our waste water management program. This cost, in addition to the surcharges and water utility bills incurred by our operation; are as significant part of our annual operations costs. As a growing industrial operation, it is very challenging for the company to maintain an enhanced waste water treatment systems as well as pay significant surcharge fees. These fees have increased significantly over the past 3 years and our fees are forecasted to be in the order of \$500,000 for 2015. By changing the surchargable parameters, the city is effectively increasing these costs significantly and further burdening industrial users. Additionally, the cost of treating BOD and SS are not additive, which we believe is reflected in the current practice of charging based on the higher of the two parameters makes sense. Charging on the basis of both parameters without an adjustment is not representative of the actual cost of treatment. The current surcharge includes a significant portion that represents capital costs. This is not true of surcharges in some other nearby municipalities and will make the City uncompetitive vs other municipalities it is important to note that the model of shared infrastructure works best when there is a fair sharing of the costs and a fair representation of the actual cost, disproportionately burdening industrial user will make the system less efficient, will result in less volume through the existing treatment plants and ultimately a higher burden overall on the City/Taxpayers to support the infrastructure, as fewer Industries will support the shared infrastructure. All of which will make the City a less desirable place for industries such as ours to operate.

Considering these factors - the Stacked Surcharges of concentration of all agreed parameters in the surcharge fee calculation will add to the financial burden of industries such as ours. This, from our perspectives as a long-time corporate citizen of this municipality, is detrimental to our commitment to job growth within the City through industrial expansion, serving only to impair our ability to maintain our operations competitively.

Respectfully submitted,

A handwritten signature in black ink that reads "Neal Lee".

Neal Lee  
President  
Wing's Food Products