

July 7, 2025

Chair Alejandra Bravo and Members of the Economic and Community Development Committee  
City of Toronto  
Toronto City Hall  
100 Queen Street West  
Toronto, ON  
M5H 2N2

Via Email: [ecdc@toronto.ca](mailto:ecdc@toronto.ca)

Re: EC22.5 - Rat Response Plan

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Dear Chair Alejandra Bravo and Members of the Economic and Community Development Committee,

On behalf of the Building Industry and Land Development Association (BILD), the Residential Construction Council of Ontario (RESCON), and NAIOP Greater Toronto (NAIOP), we are writing to express our concerns regarding agenda item EC22.5 – Rat Response Plan, scheduled for consideration at the July 8th meeting.

BILD represents the land development, home building, and professional renovation industry across the Greater Toronto Area and Simcoe Region. RESCON is Ontario's leading association representing residential builders. NAIOP is the premier commercial real estate development association representing office, industrial, retail, and mixed-use real estate across the Greater Toronto Area. Together, our organizations represent all facets of the residential and commercial development process, from planning to construction.

While we support the City's broader goal of a coordinated, proactive, and strategic approach to managing rat populations, we do not support the staff recommendation to include a rat management plan within the Construction Management Plan as an advisory comment in the Notice of Approval Conditions issued through the Site Plan Control application process.

We strongly urge the Committee not to approve this recommendation for the following reasons:

**1. No Legal Authority**

As confirmed by City Staff, the City has no legal authority to require such rat management plans through the Site Plan Control process. This omission further underscores the need for additional review and consultation before proceeding.

**2. Lack of Supporting Evidence for Toronto**

Despite our request, City staff have not provided data or evidence demonstrating a direct correlation between construction activity and increased rat populations in residential areas of Toronto. Instead, the rationale appears to rely on anecdotal media reports and practices from jurisdictions outside Canada. This is neither appropriate nor a sound basis for implementing policy.

**3. No Consultation**

BILD and RESCON were only made aware of this recommendation on June 27—less than two weeks before this item is to be considered. Policy changes that directly impact our industry must be informed by meaningful consultation, which, in this case, did not occur.

We respectfully request that this item be deferred until such time that:

- Proper consultation with the development industry has taken place;

- Supporting evidence and data are provided; and
- Legal authority for the proposed requirement is clearly established.

Assigning blame to the development industry—particularly during a time when new housing starts are in decline and the sector is under significant pressure—is misguided and premature. Thank you for the opportunity to provide our feedback. We urge the Committee to give thoughtful consideration to the concerns raised and to prioritize a collaborative and evidence-based approach moving forward.

Sincerely,



Danielle Binder, RPP MCIP  
Senior Director, Policy and  
Advocacy BILD



Richard Lyall  
President, RESCON



Leona Savoie  
Co-Chair, Government  
Relations  
NAIOP Greater Toronto

