

January 28, 2025

Attention:

Cathrine Regan

Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Via email: exc@toronto.ca

RE: EX20.8 - City of Toronto Environmental, Social, and Governance (ESG) Annual Performance Report

Dear Mayor and Executive Committee Members,

Thank you for this opportunity to comment.

According to (January 14, 2025) **City of Toronto Environmental, Social, and Governance (ESG) Annual Performance Report:**

"The primary objective of ESG Report is to present important environmental, social, and governance topics of interest to a wide range of stakeholders in a format they can use for making decisions."

Policy Horizons Canada published in 2024 Report [Disruptions on the Horizon](#):

"The Disruptions on the Horizon 2024 report identifies and assesses 35 disruptions for which Canada may need to prepare and explores some of the interconnections between them. These disruptions are potential events and circumstances that could affect our society and the way it functions, as well as the way people live, work, and connect"

[Federal panel lists 35 'plausible' future threats to Canada and the world](#) lists top 10 disruptions.

"Biodiversity is lost and ecosystems collapse" is ranked as a second highest threat, by highest combination of likelihood and impact:

"The second and third threats on the top ten list are environmental: ecosystem collapse due to loss of biodiversity and extreme weather events overwhelming our ability to respond."

In five to six years, the report says, a collapse in biodiversity "could have cascading impacts on all living things, putting basic human needs such as clean air, water and food in jeopardy."

This not apparent from City of Toronto Environmental, Social, and Governance (ESG) Annual Performance Report <https://www.toronto.ca/legdocs/mmis/2025/ex/bgrrd/backgroundfile-252176.pdf>, since there is no mention of biodiversity among the topics.

Recommendation:

Prioritize Biodiversity in The City of Toronto's annual Environmental, Social and Governance (ESG) report and along "Alignment with Toronto's Vision and Strategic Priorities" to reflect on the urgency to support and enhance Biodiversity.

The Report included in Attachment 1 - City of Toronto Environmental, Social, and Governance Performance Report <https://www.toronto.ca/legdocs/mmis/2025/ex/bgrd/backgroundfile-252177.pdf> as much as all the previous four Reports, starting in 2020, include Chapter “**Nature and Biodiversity**” consisting of almost identical text over the entire four years:

“Toronto is a place of rich biodiversity. The waterfront and deep ravines give form and identity to the city and provide habitat for flora and fauna and opportunities for recreation and active transportation. Their natural beauty promotes an appreciation for nature and allows for respite from the urban environment. Toronto's abundant natural areas connect to a larger regional ecosystem that extends from Lake Ontario north to the Oak Ridges Moraine and connects with the Ontario Greenbelt”...

Nevertheless, this fairy-tale of “*a place of rich biodiversity*” is crumbling under pressures of growth and a little to none investment, which is the most apparent in respect to Toronto crown jewel, [The Environmentally Significant Areas \(the ESAs\)](#) constituting about 4% of the city land.

In text of policies, these biodiversity hot spots are being given protection from unsustainable public use and the impacts of the adjacent development but in reality non compatible use and much accelerated development in vicinity are undermining remaining biodiversity fast. Additionally, the lacking public education and enforcement of rules continue to speed protected nature degradation and biodiversity loss.

Yours sincerely,

Lenka Holubec, member of [ProtectNatureTO](#)

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References:

<https://www.toronto.ca/city-government/budget-finance/city-finance/investor-relations/environmental-social-governance-performance-report/>

[Environmental, Social & Governance Performance Report](#)

The City of Toronto’s annual Environmental, Social and Governance (ESG) report outlines how the City is focused on ESG-related opportunities and risks across strategic priorities, sustainable finance and socioeconomic outcomes.

Toronto is the first government in Canada to issue an annual ESG report to reflect its commitment and performance in each of the three areas. The City strives to be a leader in making positive impacts across key ESG priorities through commitment, innovation and transparency.

ESG Reports

[City of Toronto Environmental, Social & Governance Performance Report, 2024](#)

[City of Toronto Environmental, Social & Governance Performance Report, 2023](#)

[City of Toronto Environmental, Social & Governance Performance Report, 2022](#)

[City of Toronto Environmental, Social & Governance Performance Report, 2021](#)

[OPA 583 Our Plan Toronto: Final Environment and Climate Change Official Plan Policy Updates](#)

These Official Plan updates are to continue Toronto's strong legacy of bringing forward leading-edge policies that protect the natural environment, support and enhance biodiversity, and address climate change.

Updates related to resilience and adaptation:

- Identification of a Water Resources System, including key hydrologic features and key hydrologic areas (Maps 9A, 9B, and 9C in Attachment 3), where Map 9 is relabelled as Map 9A and Maps 9B and 9C being new maps;
- Expanded the natural heritage system (Map 9A) to include water resource features and ravine and natural feature protected areas and to add a contributing areas layer and explanatory sidebar (3.4 the Natural Environment);
- Added four new Environmentally Significant Areas (ESA), expanded the boundaries of two existing ESAs and added two new Provincially Significant Wetlands (Maps 12A and 12B in Attachment 4);
- Updated policy recognizing the need to ensure appropriate sized infrastructure to accommodate intense storm events (2.2 Structuring Growth in the City)
- New policy encouraging development adjacent to the Natural Heritage System to provide natural landscaped surfaces that increase the ecological function and/or biodiversity (2.3.1 Healthy Neighbourhoods)
- New policy in to minimize hazards to local and migratory birds (3.4 The Natural Environment);
- Updated policies to enhance the urban forest and ensure adequate soil for new trees, protect mature and native trees, and support the health of street trees (3.4 The Natural Environment);
- Updates policy recognizing the risks associated with extreme heat (3.4 the Natural Environment), and recognizing the need for shade to ensure pedestrian comfort on City streets (3.1 The Built Environment);
- Updated policies promoting the integration of green infrastructure as a component of stormwater management (3.3 Building New Neighbourhoods, 3.4 The Natural Environment, 5.2.1 Secondary Plans);

- Updated non-policy text and added new sidebar text on the Natural Heritage System and Inventory integrating new water resources system mapping components; outlining the components of the Water Resources System; examining historical watercourses; and outlining watershed planning (Chapter 3);
- Updated non-policy text connecting the concepts of Green Infrastructure and Low Impact Development (Chapter 3);
- Added a policy minimizing the use of road salt and its impact on the natural ecosystem (3.4 The Natural Environment);
- Refined policy to prioritize green infrastructure when protecting the health of natural ecosystems (3.4 The Natural Environment);
- Refined policy to promote ecological and hydrological connectivity (3.4 The Natural Environment);
- Refined non-policy text to integrate the tree canopy targets (3.4 The Natural Environment)
- New policy encouraging development to demonstrate a net increase in ecological function on development sites within contributing areas identified on Map 9A (3.4 The Natural Environment);
- Added reference to the Biodiversity Strategy within sidebar text (3.4 The Natural Environment); and
- New policy to consider Great Lakes Strategy, and Great Lakes Protection Act when undertaking watershed and /or waterfront planning (3.4 The Natural Environment).

[Toronto Official Plan, CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO, December 2023 Consolidation](#)

“The natural heritage system is important to the City, both within and beyond our boundaries, and needs to be protected for the long term.” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-43

“Protecting Toronto’s natural environment and urban forest should not be compromised by growth, insensitivity to the needs of the environment, or neglect. To this end, proposals for new development may need to be accompanied by a study assessing their impact on the natural environment.” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-44

“Biodiversity refers to the rich variety of life forms and the critical roles they play within varied ecosystems. Ecological health is related to healthy biodiversity. The greater the biodiversity of a defined geographic area, the greater the ecological health and resiliency of that area. Policies protecting and enhancing the natural heritage system are a key pillar of biodiversity conservation within Toronto. The biodiversity found in small green spaces, street trees, green roofs, community gardens, hydro corridors, cemeteries, and backyards also play an important role in our urban ecosystem.” CHAPTER THREE BUILDING A SUCCESSFUL CITYTORONTO OFFICIAL PLAN 3-45