



EMAILED

March 19, 2025

Mayor Olivia Chow and Members of the Executive Committee,
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Ms. Cathrine Regan

Dear Mayor Chow and Committee Members:

RE: EX21.2 - City of Toronto United States Tariff Response Action Plan

The Toronto Industry Network (TIN) has reviewed the City's proposed policy regarding its response to American tariffs and has the following comments. TIN supports the City's initiative to help manufacturers and associated businesses impacted by the US trade disruptions, tariffs and threats. We offer the following comments to improve the city's response and better enable businesses to manage in the short term while they seek new markets and make other adjustments:

1. The City's action must be taken in co-ordination with federal and provincial policies on this matter. It is critical that all three levels of government harmonize their efforts to support manufacturing and industry.
2. The City's policy needs to consider and allow US-based companies with operations and employment in Toronto (or in Canada) to participate in supplying the City's procurement needs. The Buy Canadian Procurement Policies – Canadian Content Definitions' may help. Barring American-based companies with operations in Toronto from supplying the City's procurement needs only hurts workers here producing products directly or who work in the many supply chains that keep Toronto's manufacturers functioning.
3. For Toronto's companies that export to the United States the 25% tariff barrier in place south of the border is daunting. What happens when American municipalities in response to Toronto apply their own procurement policies that exclude Canadian firms?
4. The property tax deferral is helpful in addressing cash flow issues and is welcome. However, since it is only a deferral and not a reduction, these costs will still impact businesses when the deferral ends on November 30. Payment would still be required for the calendar year, which is likely the fiscal year for many businesses. Additional time for repayment or a complete or partial waiver of property taxes would be more beneficial as it would provide more time to find new markets and adjust costs.
5. The action plan needs to account for the fact that impacts to Canadian businesses began prior to March 4 which is the implementation date referenced in the report. US companies started changing their procurement practices earlier than this. A more appropriate date would be February 1 when the Executive order for tariffs was signed.

6. The City is to be commended for its initiative to view investing in the Port as a modern economic driver that will allow access to new markets. TIN has long been an advocate for Toronto's Port and looks forward to helping the City in this regard. However, this initiative is not picked up in the staff report recommendations. TIN respectfully asks that the Executive Committee recommend to Council:

'That Council direct the Chief Planner review all land use plans governing the Port area to ensure they will enable Port to grow its business and that the General Manager of Economic Development & Culture be directed in consultation with other stakeholders to develop a business plan that promotes the growth of the Port.'

The tariff crisis should be seen by the City as an opportunity to review how it could improve the way it regulates business and in particular manufacturing. What business needs from government is certainty of the positive kind that will promote business retention in our City. There are some things that are working such as the Development Charges and Site Plan exemptions and perhaps Economic Development & Growth in Employment (EDGE) program.

But then there are a number of challenges that hinder business investment here. For example, lack of division-to-division communication, Red Tape delays in obtaining necessary approvals and permitting, needless duplicative reporting requirements like ChemTrac and the proposed Buildings Environment Emissions Standards. The City must change its ways.

I would also use this opportunity to flag the proposed conversions of employment lands into residential and mixed-use development issue that never seems to go away. Every conversion of employment lands in Toronto that is approved often destabilizes nearby manufacturing operations. This creates uncertainty of operations which is a negative.

The Provincial Planning Statement 2024 has been in force since October 10, 2024, and permits developers to apply to seek land use conversions of Employment Areas to residential and mixed uses. City Planning staff have stated many times there is more than enough land designated for residential development that is outside Employment Areas.

OPAs 668 and 680 which were intended to harmonize the City's Official Plan with provincial policy, have no effect. The result has been a continuous flood of conversion applications with more than 20 alone since October 2024. TIN strongly encourages the City to lobby the province at the highest levels to reinstate policies to protect employment lands that will help provide the good jobs which permit many of Toronto's citizens the ability to live here.

I thank you for your attention.

Sincerely,



Craig McLuckie,
President
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