



September 29, 2025

Confidential

City of Toronto  
Purchasing & Materials Management  
City Hall  
18th Floor, West Tower  
Toronto, Ontario

Attention: Genevieve Sharkey  
Chief Procurement officer  
Purchasing & Materials Management

**RE: General Government Committee Direction – GG20.12 (“GG20.12”)**

Dear Ms. Sharkey,

Thank you for your letter dated August 29, 2025, providing WSP Canada Inc. (“WSP”) with formal notification of the next steps for the determination of the City of Toronto (“City”) General Government Committee Direction GG20.12. We appreciate the opportunity to provide a further follow up to our last correspondence which we submitted to you on April 21<sup>st</sup> last.

This letter is a supplement to our previous formal communication to you which provided WSP’s position regarding the General Government Committee (the “GGC”) request for a report to City Council as to whether WSP should be suspended from being eligible to bid on or be awarded any City contracts pursuant to the City’s Supplier Suspension Procedure.

We note that the City’s Supplier Suspension Procedure specifically states that a suspension should not be exercised for the purpose of punishing a Supplier, but rather, should be based on a balanced review of whether a Supplier’s conduct presents a risk to the City’s valid commercial or business interests. We submit that the City’s commercial or business interests are not at risk and that WSP has successfully delivered and is currently delivering to the City the active projects in a manner which meets or exceeds the City’s requirements.



WSP wishes to reiterate that our continued relationship with the City is of utmost importance and a key business priority for our Company. We continue to serve the City as a business partner and service provider of engineering and consulting services and reiterate that we consistently achieve and maintain performance ratings that meet or exceed the City's expectations and requirements.

WSP currently has more than 170 active projects with the City which are performed by our 2,200 WSP employees across 9 offices who are working on these projects and living in the Greater Toronto area. Please see the active project list attached as Schedule 'A' to this letter. We note that the City has continued to award WSP with new projects under different rosters and we are grateful that the City continues to demonstrate the trust they have in WSP as an engineering and consulting partner. We also note that WSP was selected for an Award of Excellence by the Canadian Consulting Engineers for the Toronto Bloor Reconstruction project. As you may know, these Awards are Canada's highest national recognition in engineering and we were very proud to receive this distinction for a project we performed with the City.

In our previous submission of April 21<sup>st</sup>, we stated that any dispute or litigation which could occur between WSP and the City would be in the normal course of business, considering the number and scale of projects and number of parties involved in such projects. We reiterate again that given the number of active projects we currently have with the City, it is not at all abnormal or unusual for there to be certain contract related disagreements. In this respect, we wish to provide you with our comments on two relevant projects.

#### Gardiner Expressway Litigation

With respect to the Gardiner Expressway litigation, we note that a pre-litigation cooperative information exchange process was entered into between WSP's insurance lawyers and the City's litigation lawyers, which process is still ongoing despite the City having formally initiated the civil law suit in January 2025. The intent of both parties is to progress the without prejudice information exchange and discussions to the point where the parties can participate in meaningful discussions on an informed basis so as to avoid any unnecessary legal proceedings. We are committed to continuing these without prejudice discussions with the City's representatives to find the best path forward.



### North York Centre Secondary Plan Review Project

With respect to the North York Centre Secondary Plan Review Project (“NYCSP”), we are pleased to report that the City has recently sent us a proposal to expand our deliverables, which we are currently reviewing. WSP is appreciative of the opportunity to continue to collaborate with the City to advance to the next phase of the Project.

We note that to date, the City's correspondence has not suggested that WSP delivered poor work and at no time did WSP request that the Project or work be suspended. Instead, our feedback from the project team has been that we provided excellent quality work on the deliverables which have already been shared publicly by the City.

### Conclusion

In conclusion, we wish to confirm our commitment to further enhance our contractual relations with the City and ensure that we continue to engage in transparent and timely discussions between the respective project teams as well as senior leaders where appropriate. We believe that such an approach through senior leadership will allow us to resolve project related issues effectively without disrupting the schedule of the Project.

We are proud that throughout our long-standing relationship, we have always delivered our services that met or exceeded the City's expectations and requirements. Any disputes or disagreements would not affect our capacity to complete our ongoing projects nor should they affect our longstanding relationship and collaboration together.

WSP is committed to enhancing our relationship with the City in a meaningful way to ensure that normal project related issues do not escalate unnecessarily. We are committed to our partnership with the City and believe that our proven track record of our delivery to the City should be considered. As a result of our long history, we have a thorough understanding of the City's infrastructure and future capital renewal requirements. As such, we are uniquely positioned to deliver high quality and cost effective engineering services. To suspend WSP for normal project related issues would be contrary to the principles behind the Supplier Suspension Procedure.



Thank you for considering this additional submission as well as our previous letter of April 21<sup>st</sup>. We are submitting this letter on behalf of all of our employees who are proud to be a part of critical infrastructure projects for the City.

We look forward to having the opportunity to attend the GGC meeting on October 23<sup>rd</sup> next.

Regards,

A handwritten signature in blue ink, appearing to read 'C Moore'.

Corina Moore, P.Eng.  
Executive Vice-President, Transportation & Infrastructure  
WSP Canada Inc.

cc: Janet Oh, Chief Legal Officer

Encl.