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29 October 2025

Ministry of Municipal Affairs and Housing
Municipal Services Office – Central Ontario
(Priority Projects)
777 Bay Street, 12th Floor
Toronto, ON
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**Re: ERO Number 025-1108
Request for a Minister's Zoning Order ("MZO") to restrict building heights to
protect a biomanufacturing campus in the City of Toronto
1875 Steeles Avenue West**

Through my company, Juno Risk Solutions Inc., I have acted as a security risk advisor to Tenblock Management Inc. since 2022. Tenblock is the development entity of Microbjo Properties Inc., the owner of the private property and existing apartment building at 1875 Steeles Avenue West in the City of Toronto. I am writing to provide my professional opinion that if the review of the proposed MZO includes consideration of national, industrial or business security matters, then such concerns are neither created nor worsened by the proposed development and any claims in regard to national, industrial or business security should not be given any weight in your evaluation.

Background

I was initially engaged in 2022 to evaluate the security concerns expressed by Tenblock's neighbour, the Sanofi Pasteur campus which is located adjacent to Tenblock's 1875 Steeles Avenue West property. My team completed this requested study in March 2022. To my knowledge, my original report has not been publicly released. For your reference I have included my July 2024 update letter to that prior report, which is in the public domain, as an attachment to this letter submission.

I have worked in the security intelligence field for over 35 years. In this capacity I have been involved in the review and design of security programs for some of the Canadian government's most secure facilities. My current practice also includes advising Canadian corporations in strategically important industries on the threat from, and security controls appropriate to address, risks posed by criminal and state-sponsored espionage. Prior to Juno Risk, I served for 20 years as an intelligence officer with the Royal Canadian Navy. My colleagues at Juno Risk include a number of long-serving former executives with the Canadian Security Intelligence Service (CSIS) each with extensive

experience that includes conducting covert surveillance and counter-surveillance operations for national security-related intelligence collection purposes. In short, we understand where and how an adversary would seek to establish an observation post and the purposes for which they are employed.

Unfounded Claims of Security Risk

I understand that Sanofi claims that Tenblock's proposed housing development project would create an increased risk of overwatch from that location which, in their judgement, poses an unacceptable national security concern to Canada or an industrial business security concern to Sanofi's ongoing operations. However, Sanofi's facility is already located in a dense residential area surrounded by single family homes and with tall residential complexes with commanding views of the Sanofi campus, all of which have been present and occupied for many years. These existing locations offer opportunities to observe into the Sanofi campus including its access points, open spaces, and buildings. If an adversary was looking to establish persistent surveillance of Sanofi's operations, there already exist many options to achieve that goal. In fact, the existing vantage points are equal or superior to those that would exist in Tenblock's buildings, as higher vantage points will have more oblique angles of view, reducing the ability to see into buildings.

I continue to maintain my professional opinion, as previously expressed in the enclosed document, that the proposed Tenblock development project does not pose any additional increased security risk to the Sanofi campus as compared to the adjacent context that has already existed for many decades.

To date, Sanofi has not explicitly articulated the basis for its security concern or how the proposed development would exacerbate that concern to my client in any specific detail. Further, Sanofi has not questioned the findings of my analysis and has not provided a response from a similarly qualified expert. It does appear, however, that Sanofi persists in its claims of unacceptable security threats posed by the Tenblock development in its engagement with government in opposition to the Tenblock development.

Your notice on the Environmental Registry of Ontario asks for input on whether you should consider a request for an MZO to impose a height limit of 33 metres at 1875 Steeles, in order to protect Sanofi's biomanufacturing campus. If you are considering this on the basis of national, industrial, or business security concerns with respect to the proposed housing development at 1875 Steeles, then it is my professional opinion that such concerns have no basis. There is simply no security risk basis to limit or block the development at 1875 Steeles and therefore you should not grant the MZO request on that basis.

Relevant Examples

In making this assessment, I have reflected on work that I have completed for Government of Canada clients in the downtown Ottawa core for comparative experience. Perhaps the most sensitive national security facility in the downtown core is the office of the Privy Council's Intelligence Assessment Secretariat. That office is located along a pedestrian street in Ottawa with a published address. Across that narrow street are commercial offices, presently available for lease as of the date of this letter, providing excellent overwatch of that facility and its access points. I am not aware of any effort to block their continued commercial use on national security grounds.

I can also cite many other examples of multi-family high-rise residential developments in the Ottawa core built in the last ten years that created overwatch conditions for sensitive national security related facilities. Rather than block these necessary residential developments that are consistent with Ottawa's urban plan and housing needs, my Government of Canada clients, and no doubt others, have taken prudent advice to reduce the risk of overwatch by employing window blinds and placing high security discussion areas in interior locations. As a sophisticated global pharmaceutical company well versed in protecting against commercial, state, or state-sponsored espionage, these precautions have no doubt already been employed by Sanofi at its Steeles Avenue facility.

In addition to the analysis provided in my attached letter, I would draw your attention to a similar development project underway in the Gloucester area of Ottawa. During the same time period that the Sanofi/Tenblock development concerns were originally being addressed, a private developer (Bertone Development Corporation) sought a zoning change to allow a 26-story multi-family residential project at 1649 Montreal Road in Gloucester. This project is immediately across Blair Road from the National Research Council (NRC) Montreal Road Campus and will also have an unobstructed view of CSIS headquarters and its open spaces and access points. Adjacent to CSIS and equally visible from the Bertone project is the Canadian Security Establishment (CSE) campus, without question, one of the most sensitive facilities in Canada.

The NRC has publicly acknowledged that their Montreal Road campus houses research that falls into the Sensitive Technology Research Areas (STRA) that are crucial for Canadian innovation and that may be of interest to foreign states, state-sponsored and non-state actors seeking to misappropriate technologies. The NRC has admitted that its Montreal Campus is host to human health therapeutics research not dissimilar to Sanofi's activities, making it a direct analogue to Sanofi's operations. Its publicly stated activities at this location include *in vivo* (live animal) studies of therapeutics, pharmacokinetics, and vaccines, supported by facilities including veterinary services, behavioural testing, imaging tools, and a range of animal containment levels.

I have reviewed the public record related to the 1649 Montreal Road project and have found no mention of any national security concerns. Such concerns did not reflect in the decision taken by the Ontario Land Tribunal (OLT) (case number OLT-22-003966) to approve this development despite the local municipal Council's prior refusal, in accordance with the provincial and local land use planning framework. This multi-residential tower is currently under construction and will house hundreds of households in close proximity to places of employment including the aforementioned institutions.

It is simply not realistic to argue that activities within Sanofi's Steeles Avenue campus are of greater national security concern to Canada, warranting greater protection, than those at CSE, CSIS Headquarters and the NRC's Montreal Road Campus, either individually, or in this case, concentrated together in adjacent properties.

Unlike the Tenblock project presently under consideration, the Bertone development project location creates a hitherto unavailable opportunity to see movement between buildings and identify vehicles entering the properties. Notwithstanding its creation of a vantage point for persistent observation of pedestrian movement, or even to identify vehicles and presumably license plates within these secure facilities, no security concern was included in the public record for the Bertone project.

If the mere opportunity to observe a sensitive facility from an elevated position posed such a significant national security risk as to warrant a government mandated cessation of development, one would have expected the Federal Government to have used its overwhelming powers to block the aforementioned Bertone Development project in Gloucester. Yet there is no evidence that such a concern was even raised let alone seriously considered in the ultimate approval of this housing development. This outcome reflects that fact that mere opportunity to observe the exterior of well protected buildings, open spaces and access points does not create a national security threat that necessitates blocking nearby development. If it did, construction of that Gloucester condominium project would not currently be well underway.

Conclusion and Recommendation

Without question, Sanofi has security concerns related to the protection of its business interests. This is not unique to Sanofi. Indeed, Public Safety Canada, CSIS and CSE have been persistent in their public and private warnings to a broad range of Canadian industries that they face realistic threats from corporate and state-sponsored espionage. I have direct personal experience evaluating threats and advising clients in a variety of industries on approaches to protect their interests.

However, simply increasing the height of a building on a neighbouring site where existing surrounding buildings and public spaces are already sufficient to gain effective view into the buildings and open spaces within the facility will not increase that risk.

If your consideration of the proposed MZO includes consideration of national security or business security concerns related to the proposed development, then please consider my professional opinion that any such concerns are neither created or worsened by the proposed development at 1875 Steeles Avenue West and should not be given any weight in your evaluation.

I welcome the opportunity to share my views with the Ministry and am available should you wish additional clarification of my analysis.

Regards,

A handwritten signature in blue ink, appearing to read 'Andrew Chester'.

Andrew Chester, CD, JD
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ENCLOSURE: 1

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July 11, 2024

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Security Risk Evaluation of Tenblock Proposed Development at 1875 Steeles to Sanofi Operations at 1755 Steeles

Juno Risk was retained in early 2022 to provide an analysis of any changed risks to national security presented to the Sanofi Operations at 1775 Steeles Avenue West ("Sanofi") by the construction of the development proposed by Tenblock at 1875 Street Avenue West (the "Proposed Development"). At your request, we recently reviewed the contents of the report we prepared for you dated March 10, 2022. We can confirm that the analytical judgements and information contained within the report upon which those judgements rely remain consistent with our current assessment of the security risk presented by the proposed development at 1875 Steeles Avenue West.

As a Canadian-based security company, we share Sanofi's national security concerns and direct our work toward improving the security posture of organizations across the ten critical infrastructure sectors in Canada. In this case, our finding is that the Proposed Development has no bearing on Sanofi's national security concerns.

We have evaluated Sanofi's national security concerns, and have determined that while national security is a valid general concern for a facility such as Sanofi, it is clear that the national security risk presented by overwatch specifically is minimal. The risk that is presented by overwatch already exists – the greatest sources of overwatch risk arise from buildings in the vicinity, and have no relation to Tenblock's property or the Proposed Development. Any risk that is presented by overwatch concerns from other properties can be easily mitigated by blinds, drapes, or window films, as may already be in use.

Indeed, some of the most sensitive entities in the Canadian government maintain secure facilities that present much higher priority national security targets for foreign intelligence collection in residential areas of much greater density and with much greater potential for overwatch risk than that presented in the Proposed Development. For example, it is public knowledge that within the Ottawa urban core, the Ministerial offices and principal supporting department staff of Public Safety Canada, the Prime Minister's Office, the Privy Council Office, Industry Science and Economic Development to name a few are all located either adjacent to or within the immediate environs of high-rise condominium buildings. Juno Risk has conducted threat risk assessments of many of these facilities and each have been able to address overwatch concerns with standard security measures as discussed within our report and which Sanofi appears to have already in place.

To summarize, Sanofi's national security concerns around overwatch risk are valid (though minimal), and are easily remedied, but exist irrespective of the Proposed Development. Furthermore, we have evaluated additional national security concerns more generally and how they would more likely manifest at Sanofi. It is our professional opinion that these more general concerns equally have no bearing on the Proposed Development. Beyond overwatch and physical security, a facility such as Sanofi might better focus its national security concerns on cyber or human espionage; not only are these the attack vectors that CSIS recommends the Bio-Tech industry focus on, but they are also borne out in existing cases of prosecuted espionage against firms in this industry. From a threat actor's perspective, the return on their espionage investment is likely to be far greater by pursuing one of these methods. Having evaluated the wide range of national security concerns, it is our opinion that the Proposed Development will have no impact on these other concerns either.

In reaching these conclusions, Juno Risk relied upon an integrated assessment team lead by me and supported by Mr. Michael Thompson and Mr. Tim Steen. My background includes a 20-year career as an intelligence officer for the Royal Canadian Navy followed by a further 20 year career as a security risk consultant. I am a lawyer and a national security specialist by education and training. As CEO of Juno Risk Solutions, I founded and have lead for the last 15 years a boutique consulting firm that includes as a dedicated practice area focused on advising businesses on national security issues and how to mitigate risks posed by foreign intelligence collection and insider threats. Mr. Thompson is a security professional and investigator with more than 45 years of experience conducting physical security assessments. He is board certified in physical security and trains candidates for certification by the American Society for Industrial Security (ASIS). Mr. Steen was formerly the chief of security for FINTRAC and CSIS and his highly experienced at designing, implementing and assessing security programs in highly classified and sensitive environments.

We encourage Goodmans and Tenblock to share our findings broadly, as we believe refocusing efforts regarding national security concerns will equally be of benefit to Sanofi – since the Proposed Development itself has no bearing on these concerns. Please communicate any questions directly to me, or more general inquiries to info@JunoRisk.com.

Regards,

A handwritten signature in black ink, appearing to read 'A. Chester'.

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