

May 5, 2025

Chair Councillor Gord Perks and Members of the Planning and Housing Committee
City of Toronto
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Nancy Martins, Committee Administrator

Re: Deferral Request- Official Plan Amendment 804 (OPA 804)

Dear Chair Perks and Committee Members,

On behalf of Canadian Manufacturers & Exporters (CME) members, I am writing to request a deferral on the adoption of OPA 804 to allow for further consultation with businesses and refinement of the policies, particularly with respect to preserving operations of Toronto manufacturers in Regeneration Areas.

From the perspective of our sector, the policy appears broadly responsive to the need to protect employment areas, including food processing, metal fabrication, pharmaceutical manufacturing, fuel terminals, airports and other activities which are essential the city's manufacturing economy. The amendment appropriately proposes restricting encroachment from non-industrial land uses, such as stand-alone retail, office, or institutional developments, which often raise land costs, introduce land use conflicts, and undermine the long-term viability of industrial operations.

However, we want to know more on the enforceable framework to safeguard manufacturing against encroachment by sensitive land uses or speculative mixed-use development, within the proposed Regeneration Areas, especially when existing operations do not meet the 'light industrial uses' definition. The current proposal is ambiguous on what constitutes "lawfully established" uses under this framework. This adds to the instability now facing many industrial landowners and employers from the tariffs and trade situation.

As I am sure you will agree, we all need to work together in this time to protect manufacturers, and I am concerned by the lack of proactive consultation of our sector on meaningful land use planning policies that impact them.

We respectfully request that the Committee defer adoption of OPA 804 until July 2025, to allow time for staff to work with stakeholders on a more balanced and protective approach for industry within the proposed Regeneration Areas. We also ask to be included in consultations as part of this process, so it may reflect the views of our members.

Sincerely,



Vincent Caron

Vice President, Ontario Government Relations and Member Advocacy

CC: Shelley Carroll, Toronto Budget Chief and Councillor, Don Valley North